STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 157

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
2019 Biennial Integrated Resource) MOTION TO AUTHORIZE COMBINED
Plan Updates and Related 2019) REPORT ON IRP UPDATES AND
Compliance Plans) COMMENTS ON REPS COMPLIANCE
) PLANS

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves for an order (1) authorizing the Public Staff to file its report pursuant to R8-60(k) stating whether the 2019 total system integrated resource plan (IRP) updates of Dominion Energy North Carolina (DENC), Duke Energy Progress, LLC (DEP), and Duke Energy Carolinas, LLC (DEC), (collectively "the utilities") meet the requirements of Commission Rule R8-60(j); (2) authorizing the Public Staff to file combined comments on the 2019 Renewable Energy and Energy Efficiency Portfolio Standard (REPS) compliance plans of the utilities; and (3) designating Thursday, October 31, 2019, as the deadline for filing the combined comments for both the Rule R8-60(j) and REPS compliance plans. In support of this motion, the Public Staff respectfully shows unto the Commission:

1. Under Commission Rules R8-60(h)(2) and (4), the utilities must file IRP updates in each odd-numbered year. Each IRP update must include the utility's REPS compliance plan for the year of filing and the two following years. Under Rule R8-60(l), the Public Staff must file a report within 60 days "whether

[the] utility's update report meets the requirements of this rule," as well as comments on the utility's REPS compliance plan.

- 2. DENC filed its 2019 IRP update on August 29, 2019, and DEC and DEP filed their IRP updates on September 3, 2019. Accordingly, the Public Staff's report on DENC's IRP update is due Tuesday, October 29, 2019, and the Public Staff's reports on DEC and DEP's IRP updates is due on October 31, 2019.
- 3. The Public Staff proposes to file a combined report on the IRP updates of the utilities and combined comments on the REPS compliance plans for the utilities on October 31, 2019.

WHEREFORE, the Public Staff prays:

- 1. That the Commission authorize the Public Staff to file a combined report on the IRP updates and combined comments on the REPS compliance plans of DEC, DEP, and DENC;
- 2. That the Commission designate Thursday, October 31, 2019, as the deadline for these filings; and
- 3. For such other and further relief as the Commission may deem just and proper.

This the 25th day of October, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David Drooz Chief Counsel

Electronically submitted /s/ Lucy E. Edmondson Staff Attorney

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CERTIFICATE OF SERVICE

I certify that a copy of this Motion to Authorize Combined Report on IRP Updates and Comments on REPS Compliance Plans has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 25th day of October, 2019.

Electronically submitted /s/ Lucy E. Edmondson