



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Tel (919) 755-8700 Fax (919) 755-8800  
www.foxrothschild.com

BRAD M. RISINGER  
Direct No: 919.755.8848  
Email: BRisinger@Foxrothschild.com

June 15, 2021

Ms. Kimberley A. Campbell  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Room 5063  
Raleigh, NC 27603

**RE: Sunstone Energy Development LLC  
Motion for Extension of Time  
Docket No. SP-100, SUB 35**

Dear Ms. Campbell:

On behalf of Sunstone Energy Development LLC, we hereby submit the attached Motion for Extension of Time to reply to comments filed by Duke Energy Progress, LLC on June 8, 2021.

Please do not hesitate to contact me should you have any questions regarding this filing.

Thank you in advance for your assistance.

Sincerely,

Brad M. Risinger

pbb

cc: All parties of record

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota  
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. SP-100, SUB 35

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
Request for Declaratory Ruling by )  
Sunstone Energy Development LLC that the )  
Jurisdiction of the N.C. Utilities Commission )  
does not extend to the Federal Enclave within )  
Fort Bragg )  
)

**MOTION FOR EXTENSION  
OF TIME**

Sunstone Energy Development LLC (“Sunstone”) hereby respectfully requests an Order from the North Carolina Utilities Commission (“Commission”) for a two-week extension of time to reply to comments filed by Duke Energy Progress in this docket. In support of this Motion, Sunstone shows the following:

1. Sunstone filed in the above-captioned docket a Petition requesting a Declaratory Ruling from the Commission.
2. On May 4, 2021, the Commission issued an order scheduling petitions to intervene and initial comments to be filed by June 8, 2021, and reply comments to be filed by July 6, 2021.
3. DEP filed initial comments on June 8, 2021, raising numerous issues of law that require additional review and response by Sunstone.
4. The deadline for reply comments by Sunstone falls immediately after a holiday weekend of July 4<sup>th</sup>, and -- given the extensive nature of DEP’s initial comments -- Sunstone’s representatives need additional time to prepare, review, finalize, and file the

reply comments. Therefore, Sunstone requests an additional two weeks to file reply comments, on or before July 20, 2021.

5. Counsel for DEP and the Public Staff have been contacted and authorize undersigned counsel for Sunstone to represent that they do not object to this requested extension of time.

WHEREFORE, Sunstone respectfully requests that the Commission issue an order granting an extension of time up to and including July 20, 2021, to file reply comments.

Respectfully submitted this the 15<sup>th</sup> day of June, 2021.

FOX ROTHSCHILD LLP



By:

Bradley M. Risinger  
Hayes Jernigan Finley  
FOX ROTHSCHILD LLP  
434 Fayetteville Street, Suite 2800  
Raleigh, NC 27601  
(919) 755-8848  
[brisinger@foxrothschild.com](mailto:brisinger@foxrothschild.com)

*Attorneys for Sunstone Energy  
Development LLC*

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned has this day served the foregoing MOTION FOR EXTENSION OF TIME upon all parties of record by electronic mail as follows:

E. Brett Breitschwerdt  
Nick A. Dantonio  
McGuireWoods, LLP  
501 Fayetteville Street, Suite 500  
Raleigh, NC 27601  
919.755.6563 (EBB phone)  
919.775.6605 (NAD phone)

Lawrence B. Somers  
Deputy General Counsel  
Duke Energy Corporation  
P.O. Box 1551 / NCRH 20  
Raleigh, North Carolina 27602  
919.546.6722

*Counsel for Duke Energy Progress, LLC*

Christopher J. Ayers, Esq.  
Executive Director, NC Public Staff  
Layla Cummings, Esq.  
NC Public Staff – Legal  
4326 Mail Service Center  
Raleigh, NC 27699

This the 15<sup>th</sup> day of June, 2021.



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Bradley M. Risinger