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Mar 09 2018

March 9, 2018

**VIA Electronic Filing**

Ms. M. Lynn Jarvis, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

**RE: Docket No. E-2, Sub 1170  
Docket No. E-7, Sub 1169  
Green Source Advantage Program and Rider GSA**

Dear Ms. Jarvis:

Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the North Carolina Utilities Commission—Public Staff respectfully submit this Joint Motion for Extension of Time for filing in the above-referenced proceeding.

Please feel free to contact me with any questions. Thank you for your assistance in this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kma

Enclosure

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-2, SUB 1170

DOCKET NO. E-7, SUB 1169

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	JOINT MOTION FOR EXENTION
Petition of Duke Energy Progress, LLC,	)	OF TIME OF DUKE ENERGY
and Duke Energy Carolinas, LLC,	)	CAROLINAS, LLC, DUKE ENERGY
Requesting Approval of Green Source	)	PROGRESS, LLC, AND PUBLIC
Advantage Program and Rider GSA to	)	STAFF—NORTH CAROLINA
Implement G.S. 62-159.2	)	UTILITIES COMMISSION

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “the Duke Utilities”), and the Public Staff — North Carolina Utilities Commission (“Public Staff” and together with the Duke Utilities, “Movants”), pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission (“Commission” or “NCUC”) for an extension of time through and including April 6, 2018, for parties to file reply comments in response to the Commission’s January 26, 2018 *Order Establishing Proceeding to Review Proposed Green Source Rider Advantage Program and Rider GSA* (“Order”). In support of this Motion, the Movants respectfully show the Commission as follows:

1. On January 22, 2018, in Docket Nos. E-2, Sub 1170 and E-7, Sub 1169, DEP and DEC jointly filed the proposed Green Source Advantage program and Rider GSA, consistent with the requirements of Section 3.(b) of House Bill 589.

2. On January 26, 2018, by its *Order Establishing Proceeding to Review Proposed Green Source Rider Advantage Program and Rider GSA*, the Commission directed interested parties to file petitions to intervene pursuant, as well as initial comments

on Duke Utilities' proposed Green Source Advantage program and Rider GSA rider on or before February 23, 2018. Ordering paragraph 4 of the Commission's Order also directed the Duke Utilities and other interested parties to file reply comments on or before March 16, 2018.

3. On February 22, 2018, the United States Department of Defense and all other Federal Executive Agencies ("DOD/FEA") filed joint initial comments.

4. On February 23, 2018, initial comments were also filed by Wal-Mart Stores East, and Sam's East, Inc. (collectively, "Wal-Mart"); Apple and Google; the North Carolina Sustainable Energy Association ("NCSEA"); the University of North Carolina at Chapel Hill ("UNC-CH"), the North Carolina Clean Energy Business Alliance ("NCCEBA"), the Southern Alliance for Clean Energy ("SACE"), and the Public Staff.<sup>1</sup>

5. The Duke Utilities and the Public Staff are working diligently to meet the March 16, 2018 reply comments deadline. However, given the significant time Movants have committed to other matters scheduled for hearing at the Commission this month as well as the Duke Utilities' ongoing efforts to implement other programs and requirements established in House Bill 589, the Movants require additional time to finalize their reply comments and to address the comments and statements of position that have been submitted by other parties.

6. Based on the foregoing, the Movants request an extension of time up to and including April 6, 2018, for all parties to file reply comments in this proceeding.

7. Counsel for the Duke Utilities has contacted counsel for all parties of record regarding this Motion via telephone and/or electronic mail. Counsel for NCSEA,

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<sup>1</sup> Certain other interested parties did not intervene but did file statements of position with the Commission.

NCCEBA, Wal-Mart, North Carolina Electric Membership Corporation, DOD/FEA, UNC-CH, Apple and Google, and SACE have each agreed to the requested extension. No other party has advised that it objects to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, and the Public Staff respectfully request that the Commission grant this Motion for an extension of time through and including Friday, April 6, 2018, for parties to file reply comments regarding potential revisions to Duke Utilities' proposed Green Source Advantage program.

Respectfully submitted, this 9<sup>th</sup> day of March, 2018.

/s/E. Brett Breitschwerdt

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/s/Tim R. Dodge

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*Staff Attorney, Public Staff – North Carolinas  
Utilities Commission*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Joint Motion for Extension of Time*, filed in Docket Nos. E-2, Sub 1170 and E-7, Sub 1169, was served electronically or via U.S. mail, first-class postage prepaid, upon all parties of record.

This the 9<sup>th</sup> day of March, 2018.

/s/E. Brett Breitschwerdt

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