

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  
Petition for Approval of Green Source )  
Advantage Program and Rider GSA to )  
Implement N.C. Gen. Stat. § 62-159.2 )

**MOTION FOR  
EXTENSION  
OF TIME**

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and respectfully requests that the Commission grant a second extension of time for all interested parties to file reply comments pursuant to the Commission's January 26, 2018, *Order Establishing Proceeding to Review Proposed Green Source Rider Advantage Program and Rider GSA* in the above-captioned docket.

In support of this motion, the Public Staff shows the following:

1. On January 23, 2018, Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (collectively "Duke"), jointly filed a petition for approval of their proposed Green Source Advantage Program ("GSA Program") and Rider GSA tariffs.

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 GSA 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, 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.

5. On March 9, 2018, the Public Staff and Duke filed a joint motion for an extension of time for the filing of reply comments, requesting an extension from March 16, 2018 to April 6, 2018. The Commission granted the request by Order dated March 13, 2018.

6. The Public Staff and other parties are working diligently to meet the March 16, 2018 reply comments deadline. However, due to the press of business, and to allow additional time for potential further discussions between the parties to take place, the Public Staff requests an extension to Friday, April 20, 2018, for all parties to file reply comments in this proceeding.

7. The Public Staff has contacted counsel for parties to this proceeding and sought feedback regarding this motion, and no party responded with objections to the proposed extension.

**WHEREFORE**, the Public Staff respectfully requests that the Commission issue an order:

1. Extending the deadline for filing reply comments to Friday, April 20, 2018; and

2. For any further relief the Commission may deem just and proper.

This the 4<sup>th</sup> day of April, 2018.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

David T. Drooz  
Chief Counsel

Electronically submitted  
/s/ Tim R. Dodge  
Staff Attorney

4326 Mail Service Center  
Raleigh, North Carolina 27699-4300  
Telephone: (919) 733-6110  
[tim.dodge@psncuc.nc.gov](mailto:tim.dodge@psncuc.nc.gov)

**CERTIFICATE OF SERVICE**

I certify that a copy of this Motion for an Extension of Time 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 4<sup>th</sup> day of April, 2018.

Electronically submitted  
/s/ Tim R. Dodge