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Apr 27 2020

April 27, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: *Joint Motion for Further Extension of Time to File Queue Reform Proposal*
Docket No. E-100, Sub 101

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the North Carolina Clean Energy Business Alliance is their *Joint Motion for Further Extension of Time to File Queue Reform Proposal*.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| | |
|---------------------------------------|-----------------------------------|
| In the Matter of | |
| Petition for Approval of Revisions to |) JOINT MOTION FOR FURTHER |
| Generator Interconnection Standards |) EXTENSION OF TIME TO FILE QUEUE |
| |) REFORM PROPOSAL |

NOW COME Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke”), and the North Carolina Clean Energy Business Alliance (“NCCEBA” and together with Duke, “Joint Movants”), and pursuant to Commission Rule R1-7, move the North Carolina Utilities Commission (“Commission” or “NCUC”) for a further extension of time through and including May 15, 2020, for Duke to file its Queue Reform Proposal and to commence the associated comment period, as most recently established by the Commission’s March 27, 2020 *Order Granting Further Extensions of Time*.

In support of this Motion, the Joint Movants show the Commission the following:

1. On August 27, 2019, the Commission issued its *Order Requiring Queue Reform Proposal and Comments* (“*Queue Reform Order*”), directing Duke to “file a queue reform proposal consistent with the Commission’s June 14, 2019 Order” on or before October 15, 2019, addressing the Companies’ proposed revisions to the North Carolina Interconnection Procedures, forms, and agreements (collectively, the “NC Procedures”) needed to implement queue reform. The *Queue Reform Order* further established a comment period on the required queue reform proposal, providing that parties could file

comments on that proposal on or before November 8, 2019, and that the Companies could file reply comments on or before December 2, 2019.

2. On October 15, 2019, in compliance with the Commission's *Queue Reform Order*, Duke provided an overview of the structure of their queue reform proposal ("Duke Queue Reform Framework"). The Duke Queue Reform Framework explained that Duke had established a comprehensive stakeholder process to further develop their Queue Reform Framework, and that the Companies planned to engage in further stakeholder process and engagement in order to further refine and finalize the queue reform proposal to be filed with the Commission.

3. Also on October 15, 2019, Duke filed a Motion to Delay, requesting the Commission delay the comment period established by the Commission's *Queue Reform Order*, in order for Duke to complete the remainder of the planned stakeholder process prior to engaging in the Commission-directed comment period on Duke's queue reform proposal.

4. On October 23, 2019, the Commission issued its *Order Granting Motion to Delay*, directing Duke, on or before February 28, 2020, to either (1) file the Duke queue reform proposal as modified based on feedback from the stakeholder process or (2) notify the Commission that no further modifications are needed to the Duke Queue Reform Framework based on stakeholder feedback. The *Order Granting Motion to Delay* also established March 27, 2020, as the deadline for parties to file comments on 'the Companies' February 28, 2020 filing, and April 27, 2020, as the deadline for the filing of reply comments.

5. On February 21, 2020, Duke filed a motion requesting an extension of time through and including March 31, 2020, to file its Queue Reform Proposal and to commence the associated comment period established by the Commission's October 23, 2019 *Order Granting Motion to Delay*, in the interest of allowing additional time for stakeholders to review and informally discuss Duke's proposed revisions to the NC Procedures to fully implement the Queue Reform Proposal. Duke's motion provided the Commission information on the three queue reform stakeholder meetings held between November 2019 and January 2020, as well as Duke's plans to host additional stakeholder meetings on the Companies' proposed revisions to the NC Procedures required to implement queue reform.

6. On February 26, 2020, the Commission issued its *Order Granting Extensions of Time*, granting Duke's February 21, 2020 motion and extending the time for Duke to file its queue reform proposal and a redlined version of the NC Procedures to March 31, 2020. The *Order Granting Extensions of Time* also extended the time for comments on Duke's queue reform proposal to April 30, 2020, and the time for reply comments to May 29, 2020.

7. Following the issuance of the Commission's *Order Granting Extensions of Time*, Duke circulated proposed queue reform revisions to the NC Procedures on March 3, 2020, and has subsequently held two additional queue reform stakeholder meetings to discuss the Companies' proposal.

8. On March 10, 2020, Duke led a three-hour page-turn review of the queue reform revisions to the NC Procedures, and solicited written feedback on the queue reform revisions to the NC Procedures.

9. On March 16, 2020, NCCEBA provided significant feedback on Duke's queue reform proposal on behalf of the North Carolina solar industry. Feedback was also received from a solar developer member of NCCEBA independently of NCCEBA's written feedback. The Companies did not receive written feedback from other stakeholders on the proposal.

10. Duke responded in writing to NCCEBA and the other stakeholder that had provided written feedback on March 19, 2020, and held another stakeholder meeting on March 20, 2020, to discuss NCCEBA's recommended modifications to the queue reform proposal, as well Duke's responses to such feedback. The March 20 stakeholder meeting was held telephonically due to the current COVID-19 pandemic.

11. On March 24, 2020, Duke and NCCEBA jointly filed a Motion for Further Extension of Time requesting the Commission delay both the filing of Duke's queue reform proposal and the comment period established by the Commission on its proposal. Joint Movants requested the delay to allow Duke to incorporate requested changes to the queue reform proposal from NCCEBA, and to circulate the new draft to all stakeholders in early April and hold an additional stakeholder meeting to discuss the amended proposal.

12. On March 27, 2020, the Commission issued its *Order Granting Further Extensions of Time*, finding good cause to grant Joint Movants' motion and to extend the time for Duke to file its queue reform proposal and a redline version of the NC Procedures conforming to its queue reform proposal to April 30, 2020. The Commission's Order also extended the time for comments on Duke's proposal to May 28, 2020, and the time for reply comments to June 25, 2020.

13. On April 9, 2020, Duke led an additional stakeholder meeting, Stakeholder Meeting #10, to review amendments to the queue reform revisions to the NC Procedures incorporated as a result of further stakeholder input and negotiations with NCCEBA.

14. On April 23, 2020, Duke provided responses to NCCEBA's further comments on queue reform resulting from Stakeholder Meeting #10, as well as an updated redline to the NC Procedures incorporating additional amendments to the queue reform revisions to the NC Procedures.

15. At this time, NCCEBA is in the process of reviewing the additional amendments to the queue revisions to the NC Procedures incorporated by Duke as a result of Stakeholder Meeting #10. Counsel for Duke and NCCEBA have discussed and agree that a fifteen (15) day extension of time would be beneficial to allow further time to discuss the amendments, and in support of Duke's continuing efforts to reach consensus on revisions prior to filing the proposal with the Commission.

16. Based on the foregoing, the Movants request an extension of time up to and including May 15, 2020, for Duke to file its Queue Reform Proposal and for the comment period established in the Commission's *Order Granting Extensions of Time* to open. Comments would then be due Monday, June 15, 2020, and reply comments would be due Wednesday, July 15, 2020.

17. The Joint Movants have shared the Motion with the Public Staff, Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC"), and the North Carolina Sustainable Energy Association ("NCSEA"). The Public Staff, DENC, and NCSEA do not object to the Motion, including delay of the comment period contemplated by the Commission's *Order Granting Further Extensions of Time*.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the North Carolina Clean Energy Business Alliance respectfully request that the Commission grant this Motion for an extension of time through and including May 15, 2020, for Duke to file its Queue Reform Proposal and for the comment period established by the Commission's *Order Granting Extensions of Time* to open.

Respectfully submitted, this the 27th day of April, 2020.

/s/E. Brett Breitschwerdt

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*Attorney for the North Carolina Clean
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Further Extension of Time to File Queue Reform Proposal, as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 27th day of April, 2020.

/s/E. Brett Breitschwerdt

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