

May 3, 2024

**VIA ELECTRONIC FILING**

Ms. A. Shonta Dunston, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**Re: Duke Energy Carolinas, LLC's, Duke Energy Progress, LLC's, and  
the Public Staff's – North Carolina Utilities Commission, Joint  
Motion for Extension of Time  
Docket No. E-100, Sub 194**

Dear Ms. Dunston:

Enclosed for filing in the above-captioned docket is the Joint Motion for Extension of Time to File Proposed Orders by Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the Public Staff – North Carolina Utilities Commission.

Please feel free to contact me if you have any questions.

Very truly yours

/s/ E. Brett Breitschwerdt

EBB/sc

cc: Parties of Record

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 194

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

	)	
In the Matter of	)	<b>JOINT MOTION FOR</b>
Biennial Determination of Avoided Cost	)	<b>EXTENSION OF TIME TO FILE</b>
Rates for Electric Utility Purchases from	)	<b>PROPOSED ORDERS BY DUKE</b>
Qualifying Facilities – 2023	)	<b>ENERGY CAROLINAS, LLC,</b>
	)	<b>DUKE ENERGY PROGRESS,</b>
	)	<b>LLC, AND THE PUBLIC STAFF</b>
	)	

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NOW COME Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP”) (collectively “Duke Energy” or the “Companies”), and the Public Staff - North Carolina Utilities Commission (“Public Staff”) by and through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”) and hereby respectfully move the Commission for a ten (10) day extension of time, through and including May 20, 2024, for the parties to file proposed orders in this docket. In support thereof, the Companies and the Public Staff state the following:

1. On August 7, 2023, the Commission issued its *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* (“2023 Scheduling Order”), establishing this proceeding as the Commission’s biennial proceeding held pursuant to N.C. Gen. Stat. § 62-156(a) to implement Section 210 of the Public Utility Regulatory Policies Act of 1978. The 2023 Scheduling Order directed the Companies and other utilities to file initial statements and updated avoided cost rates and tariffs on November 1, 2023. (“Initial Filings”) and also provided for the filing of initial comments and reply comments.

2. On November 1, 2023, the Companies, along with Dominion Energy North Carolina (“DENC”), each made their Initial Filings in the above-captioned docket. On the same date, Western Carolina University and Appalachian State University, d/b/a New River Light and Power Company filed their Joint Comments and Proposed Rates.

3. On January 30, 2024, the North Carolina Sustainable Energy Association (“NCSEA”), Carolinas Clean Energy Business Alliance (“CCEBA”), and Southern Alliance for Clean Energy (“SACE”) filed a Joint Motion for Extension of Time through and including February 21, 2024, for the parties to file their initial comments and through and including March 27, 2024, for parties to file their reply comments, which was granted by Commission order issued on February 6, 2024.

4. On February 21, 2024, the Public Staff, the North Carolina Attorney General’s Office (“AGO”), SACE, CCEBA, and NCSEA filed initial comments.

5. On March 27, 2024, the parties filed reply comments.

6. On April 10, 2024, the Commission issued its *Order Requiring the Filing of Proposed Orders and Briefs*, determining that a full evidentiary hearing was not required and ordering the parties to file any proposed orders and/or briefs on or before May 10, 2024.

7. The Companies and the Public Staff are working diligently to develop a joint proposed order in this matter. However, due to the press of other business, including numerous other proceedings before the Commission involving the same Duke Energy personnel, the Companies require additional time to prepare a robust joint proposed order with the Public Staff that appropriately reflects the issues before the Commission in this

proceeding. The Companies and the Public Staff therefore respectfully request an extension of ten (10) days for all parties to file proposed orders and/or briefs.

8. The requested extension will not result in prejudice to any party.

9. Counsel for the Companies has contacted all parties to this docket about the requested extension. The AGO and NCSEA indicated support for the Motion and no other party objected to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the Public Staff respectfully request that the Commission issue an order granting an extension of time, through and including May 20, 2024, for the parties to file proposed orders and/or briefs, and such other relief as the Commission deems reasonable and proper.

Respectfully submitted, this the 3<sup>rd</sup> day of May, 2024.

/s/ E. Brett Breitschwerdt

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**CERTIFICATE OF SERVICE**

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC's, and the Public Staff's Joint Motion for an Extension of Time, in Docket No. E-100, Sub 194, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 3<sup>rd</sup> day of May, 2024.

*/s/ E. Brett Breitschwerdt* \_\_\_\_\_

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