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June 23, 2021

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

***RE: Joint Petition for Approval of Model Small Generation
Interconnection Standards & Associated Application to
Interconnect & Interconnection Contract Forms
NCUC Docket No. E-100, Sub 101***

Dear Ms. Campbell:

On behalf of Strata Solar, LLC, Strata Solar Development, LLC, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, we submit the attached **Joint Motion for Further Extension of Time to File Reply Comments** in the above-referenced docket.

Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Karen M. Kemerait'.

Karen M. Kemerait

KK:bs

cc: All parties of record
Enclosures

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 Virginia Washington

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JUN 23 2021

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of:
Joint Petition for Approval of Model Small
Generation Interconnection Standards &
Associated Application to Interconnect &
Interconnection Contract Forms

**JOINT MOTION FOR FURTHER
EXTENSION OF TIME TO FILE
REPLY COMMENTS**

NOW COME Strata Solar, LLC and Strata Solar Development, LLC (collectively, “Strata”) and Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke”), by and through counsel and pursuant to Rules R1-7 and R1-9 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and move the Commission for an additional extension of time for thirty (30) days to file reply comments.

In support of this Motion, Strata and Duke show the Commission the following:

1. On March 9, 2021, the Commission issued its *Order Seeking Comments Regarding Generator Inspection Provisions of the North Carolina Generator Interconnection Standards* (“Order Seeking Comments”). In the Commission’s Order Seeking Comments, the Commission requested comments from the parties as to their concerns regarding the inspection of facilities.
2. By Order dated March 16, 2021, the Commission extended the times for all parties to file comments until March 29, 2021 and reply comments until April 12, 2021.

3. On March 29, 2021, Duke filed comments, Strata and the Carolinas Clean Energy Business Association (“CCEBA”) filed joint comments, and the Public Staff filed a letter in lieu of comments.

4. On April 7, 2021, Strata and CCEBA requested an extension of time for fourteen (14) days for the parties to file reply comments so that they could have discussions with Duke and the Public Staff about issues related to the inspection of the facilities. On April 12, 2021, the Commission granted the extension of time for the parties to file reply comments.

5. On April 19, 2021, Strata and CCEBA requested a further extension of time for thirty (30) days for the parties to file reply comments. By order dated April 20, 2021, the Commission granted the extension of time for the parties to file reply comments by May 26, 2021.

6. On May 20, 2021, Strata and Duke requested a further extension of time for thirty (30) days for the parties to file reply comments. By order dated May 21, 2021, the Commission granted the extension of time for the parties to file reply comments by June 25, 2021.

7. Strata and Duke continue to engage in discussions about the resolution of issues related to the inspection of facilities. While the discussions between Strata and Duke have been productive and Strata and Duke expect that they will reach an agreement to resolve the issues, Strata and Duke need additional time to agree to finalize ongoing discussions. Therefore, Strata and Duke request an extension of time for additional thirty (30) days so that they may finalize the terms of agreement.

8. CCEBA and the Public Staff have indicated that they do not oppose Strata's and Duke's request for an additional extension of time for thirty (30) days for the parties to file reply comments.

WHEREFORE, Strata and Duke respectfully request that the Commission grant an additional thirty (30)-day extension of time so that the parties may file reply comments on or before July 26, 2021.

Respectfully submitted this 23rd day of June, 2021.



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/s/ Jack E. Jirak

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing MOTION FOR FURTHER EXTENSION OF TIME TO FILE REPLY COMMENTS has been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

This 23rd day of June, 2021.

/s/ Karen M. Kemerait
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