

Kendrick C. Fentress Associate General Counsel

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October 3, 2018

VIA ELECTRONIC FILING

M. Lynn Jarvis, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

RE: Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Piedmont

Natural Gas Company, Inc. and Public Staff's Joint Motion for

Extension of Time

Docket Nos. E-7, Sub 1100D, E-2, Sub 1095D and G-9, Sub 682D

Dear Ms. Jarvis:

Please find enclosed for filing Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Piedmont Natural Gas Company, Inc. and the Public Staff's Joint Motion for Extension of Time in the above-referenced docket.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Kendrick C. Fentress

Kendrik C. Sertress

Enclosure

cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1095D DOCKET NO. E-7, SUB 1100D DOCKET NO. G-9, SUB 682D

In the Matter of) JOINT MOTION BY DUKE Comprehensive, Third-Party, ENERGY CAROLINAS, LLC,) Independent Audits of Transactions, **DUKE ENERGY PROGRESS, LLC,** Services, and other Affiliate Dealings PIEDMONT NATURAL GAS COMPANY, INC. AND THE Pursuant to the Regulated Utility-to-Regulated Utility Service Agreement **PUBLIC STAFF – NORTH** and other Utility to Utility Service CAROLINA UTILITIES **COMMISSION FOR EXTENSION** Agreements **OF TIME**

NOW COME Duke Energy Progress, LLC ("DEP"), Duke Energy Carolinas, LLC ("DEC"), Piedmont Natural Gas Company, Inc. ("Piedmont") (collectively "the Companies"), and the Public Staff – North Carolina Utilities Commission (the "Public Staff"), by and through counsel and pursuant to Rule R1-9 of the North Carolina Utilities Commission ("Commission") Rules and Regulations, and jointly request a six-month extension of time to jointly propose an auditor to conduct the comprehensive, third-party audit of transactions, services, and other affiliate dealings pursuant to utility-to-utility service agreements, as set forth in Regulatory Condition No. 5.8(a)(i). In support, the Companies and the Public Staff show the following:

1. Regulatory Condition No. 5.8(a) provides that no less often than every two years, a third-party independent audit shall be conducted related to the affiliate transactions undertaken pursuant to Affiliate agreements filed in accordance with all conditions approved by the Commission concerning affiliate transactions, including the propriety of the transfer pricing of goods and services between or among DEC, DEP, Piedmont, other Affiliates, and all of the Nonpublic Utility Operations. Regulatory Condition 5.8(a)

provides that the first audit shall begin two years from the date of the close of the merger of Duke Energy Corporation and Piedmont ("Merger"). The Merger closed October 3, 2016.

- 2. Due to the press of other business, the process to select an auditor has not been initiated. In past audits, the Public Staff has prepared a formal Request for Proposals ("RFP"), which include a detailed description of the scope of the audit that is reviewed by the Companies prior to issuance. After the RFP is issued, interviews of respondents will be conducted, and the Public Staff will make a recommendation of the auditor to the Commission. *See*, *e.g.*, Docket No. E-7, Sub 986D.
- 3. The Companies and the Public Staff jointly request, therefore, an additional six months, not later than April 1, 2019, so that the Public Staff has sufficient time to issue the RFP, with the consultation of the Companies, and to conduct the interviews in order to make its recommendation of an auditor.

WHEREFORE, the Companies and the Public Staff respectfully request that the Commission grant an extension until April 1, 2019 to commence the comprehensive, third-party audit of the Companies' affiliate transactions under the utility to utility service agreements and any such further relief as the Commission deems just and proper.

Respectfully submitted, this the 3rd day of October, 2018.

Kendrik C. Sertress

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ATTORNEY FOR DUKE ENERGY CAROLINAS, LLC, DUKE ENERGY PROGRESS, LLC AND PIEDMONT NATURAL GAS COMPANY, INC.

Electronically submitted /s/ Elizabeth D. Culpepper Elizabeth D. Culpepper Staff Attorney 4326 Mail Service Center Raleigh, North Carolina 27699-4300 (919) 733-6110 elizabeth.culpepper@psncuc.nc.gov

ATTORNEY FORTHE PUBLIC STAFF – NORTH CAROLINA UTILITIES COMMISSION

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Piedmont Natural Gas Company, Inc. and the Public Staff's Joint Motion for Extension of Time in Docket Nos. E-7, Sub 1100D, E-2, Sub 1095D and G-9, Sub 682D 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 3rd day of October, 2018.

Kendrick C. Fentress

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Associate General Counsel

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