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October 3, 2019

Janice H. Fulmore, Deputy Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4325

Docket Nos. E-2, Sub 931 and E-7, Sub 1032

Dear Ms. Fulmore:

With regard to the above-referenced dockets, I transmit herewith for filing a consent Motion for Extension of Time to File Reply Comments on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC.

By copy of this letter, I am serving all parties of record.

Respectfully submitted,

/s/ Molly McIntosh Jagannathan molly.jagannathan@troutman.com

**Enclosure** 

Copy: Parties of Record

## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 931 DOCKET NO. E-7, SUB 1032

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

Docket No. E-2, Sub 931	)
	)
In the Matter of	)
Application by Carolina Power & Light, d/b/a	)
Progress Energy Carolinas, Inc., for Approval	)
of Demand-Side Management and Energy	) MOTION FOR FURTHER
Efficiency Cost Recovery Rider Pursuant to	) EXTENSION OF TIME TO FILE
N.C. Gen. Stat. §62-133.9 and Commission	) REPLY COMMENTS
Rule R8-69	)
	)
Docket No. E-7, Sub 1032	)
,	)
In the Matter of	)
Application of Duke Energy Carolinas, LLC	, )
for Approval of New Cost Recovery	
Mechanism and Portfolio of Demand-Side	)
Management and Energy Efficiency Programs	)

NOW COME Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") and respectfully request that the Commission extend by an additional 60 days the time in which to file reply comments in the review of the demand-side management ("DSM")/energy efficiency ("EE") cost recovery mechanisms ("Mechanisms") of DEC and DEP, in the above-captioned dockets. In support of this motion, DEC and DEP show the following:

1. On February 6, 2019, the Commission issued an order in these dockets requesting comments by June 7, 2019, and reply comments by July 10, 2019, from the Public Staff and intervenors addressing possible changes to the DEC and DEP Mechanisms for recovery of DSM/EE costs and incentives.

- 2. On May 30, 2019, the North Carolina Attorney General's Office ("AGO") filed a motion requesting that the dates for comments and reply comments be extended to July 10, 2019, and August 7, 2019, respectively. The Commission granted this Motion on May 31, 2019.
- 3. On July 10, 2019, initial comments on the DEC and DEP Mechanisms were filed by the AGO; the Public Staff; and by the Natural Resources Defense Council ("NRDC"), Southern Alliance for Clean Energy ("SACE"), Sierra Club, and South Carolina Coastal Conservation League ("SCCCL"), and North Carolina Sustainable Energy Association ("NCSEA").
- 4. The Public Staff sought and was granted a 30-day extension of time in which to file reply comments, so that the parties that filed initial comments, DEC, and DEP (collectively, the "Parties") could meet prior to filing reply comments to discuss where there may be consensus or potential avenues for resolution. A meeting of the Parties was held on August 15, 2019.
- 5. The Public Staff sought and was granted an additional 30-day extension of time in which to file reply comments, so that the Parties could conduct a second meeting, which was held on September 6, 2019.
- 6. The Parties continue to discuss where there may be consensus or potential avenues for resolution and have scheduled a third meeting for October 9, 2019, which is after the current deadline for filing reply comments.
- 7. To allow the Parties further time to meet and work toward potential resolution of some or all of the issues, DEC and DEP requests an additional 60-day extension of the time by which reply comments must be filed.
- 8. Counsel for DEC and DEP has conferred with counsel for the Public Staff, AGO, NRDC, SACE, Sierra Club, and SCCCL, and NCSEA, and all consent to a further 60-day extension of the date by which reply comments must be filed.

9. Therefore, DEC and DEP respectfully request that the Commission extend the deadline for the filing of reply comments from October 7, 2019 to December 6, 2019.

Respectfully submitted this the 3rd day of October, 2019.

Electronically submitted

/s/ Molly McIntosh Jagannathan Troutman Sanders LLP 301 South College Street, Suite 3400 Charlotte, North Carolina 28202 Tel: 704-998-4074 molly.jagannathan@troutman.com North Carolina State Bar No. 36931

ATTORNEYS FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Motion for Further Extension of Time in Which to File Reply Comments in Docket Nos. E-2, Sub 931 and E-7, Sub 1032 has been served by electronic mail (e-mail), hand delivery, or by depositing a copy in the United States Mail, first class postage prepaid, properly addressed to the parties of record.

This, the 3rd day of October, 2019.

Electronically submitted

/s/ Molly McIntosh Jagannathan Troutman Sanders LLP 301 South College Street, Suite 3400 Charlotte, North Carolina 28202 Tel: 704-998-4074 molly.jagannathan@troutman.com North Carolina State Bar No. 36931

ATTORNEYS FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC