

**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	)	CCEBA's MOTION FOR EXTENSION
Generator Interconnection Standards	)	OF TIME TO FILE REPLY COMMENTS

NOW COMES the Carolinas Clean Energy Business Association ("CCEBA"), an Intervenor in this docket, and moves the Commission for a 10-day extension of time within which to file comments regarding the generator inspection provisions of the North Carolina Generator Interconnection Standard. In support of this motion, CCEBA shows the Commission the following:

1. Since the Commission originally requested comments on this matter by filed on March 9, 2021, representatives of Strata Solar, LLC and Strata Solar Development, LLC (together "Strata") and Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (together "Duke") (together with Strata "the Negotiating Parties") have been working to resolve certain issues related to inspections of existing solar generating facilities. Those parties have received additional extensions of time until the current deadline of June 26, 2021.
2. During the interim, CCEBA has received occasional updates on the progress of the negotiations and concepts being discussed by the Negotiating Parties. However, CCEBA did not receive draft language of any Memorandum of Agreement ("MOA") during that time.
3. CCEBA understands the Negotiating Parties have been working diligently to arrive at a compromise and at language of a proposed MOA among the Negotiating Parties which could be used as a basis for similar agreements with other generators, including members of CCEBA.
4. At the close of business on Thursday, June 22, 2021, CCEBA received a draft MOA. While undersigned counsel has reviewed the MOA, CCEBA has not had the opportunity to discuss the MOA with the members of its executive committee or its membership in general.
5. Because the terms of the proposed MOA received on Thursday would have implications for all solar generators with existing facilities, CCEBA is unable to

consent to or comment upon the terms of the proposed MOA until it is able to have further discussions with its membership.

6. A ten-day extension would provide CCEBA and other Intervenors with the time necessary to review and provide feedback on the terms of the proposed MOA and, if necessary, prepare comments for filing with this Commission.
7. Undersigned counsel has consulted with counsel for Strata, Duke, and the Public Staff. All have informed CCEBA that they will not object to this motion.

WHEREFORE, CCEBA moves the Commission to extend the time for comments on the generator inspection provisions of the North Carolina Generator Interconnection Standard by ten days until August 5, 2021. CCEBA submits that this extension is in the public interest and will allow sufficient time for the proposed MOA to be reviewed by affected parties prior to comments being due.

Respectfully submitted this 26<sup>th</sup> day of July 2021.

CAROLINAS CLEAN ENERGY BUSINESS  
ASSOCIATION

By:     /s/ John D. Burns      
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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 prebaid, and/or by electronic delivery as allowed by rule.

This 26h day of July 2021.

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