

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1300

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Application by Duke Energy Progress, LLC,)	JOINT MOTION TO EXTEND
For Adjustment of Rates and Charges)	TIME FOR A RESPONSE TO THE
Applicable to Electric Service in North)	FEBRUARY 3, 2023 MOTION OF
Carolina and Performance-Based Regulation)	THE PUBLIC STAFF TO COMPEL
)	

NOW COME the Public Staff – North Carolina Utilities Commission (“Public Staff”), by and through its Executive Director, Christopher J. Ayers, and Duke Energy Progress, LLC (“DEP” or the “Company”), by and through its legal counsel, and pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and respectfully jointly move to extend the deadline by which DEP must respond to the Motion of the Public Staff to Compel (“Motion”). In support of this Joint Motion, the parties state as follows:

1. On October 6, 2022, DEP filed its Application to Adjust Retail Base Rates and for Performance-Based Regulation, and Request for an Accounting Order (“Application”).

2. In connection with a set of discovery requests served by Public Staff on January 20, 2023 (PS DR-137), Public Staff filed the Motion on February 3, 2023. Under the Scheduling Order entered by the Commission in this case, DEP’s response to the Motion is due today, February 6, 2023.

3. Subsequent to the filing of the Motion, the parties have engaged in communications regarding the questions in PS DR-137 and met to discuss a compromise that would allow DEP to respond to PS DR-137. To provide time for DEP to respond, the parties seek to extend the deadline for DEP to respond to the Public Staff's Motion from Monday, February 6, 2023 until Friday, February 10, 2023.

4. DEP and Public Staff submit that no party will be prejudiced by the relief requested in this joint motion.

Accordingly, Public Staff and DEP jointly move the Commission to extend the time for DEP to file a response to Public Staff's Motion.

Respectfully submitted, this the 6th day of February, 2023.

PUBLIC STAFF

/s/ Robert B. Josey

Robert B. Josey

Staff Attorney

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DUKE ENERGY PROGRESS, LLC

/s/ Jack E. Jirak

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CERTIFICATE OF SERVICE

Docket No. E-2, Sub 1300

I hereby certify that a copy of the foregoing **JOINT MOTION TO EXTEND TIME FOR A RESPONSE TO THE FEBRUARY 3, 2023 MOTION OF THE PUBLIC STAFF TO COMPEL** was served electronically or by depositing a copy in United States Mail, first class postage prepaid, properly addressed to the parties of record.

This the 6th day of February, 2023.

PUBLIC STAFF

/s/ Robert B. Josey

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