

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 141

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
2014 Biennial Integrated Resource Plan Updates)	Motion for
and Related 2015 REPS Compliance Plans)	Extension of Time

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully requests the Commission to issue an order extending by 21 days the time for (a) the Public Staff to file a report to the Commission whether the total system integrated resource plan (IRP) of Dominion North Carolina Power (DNCP) filed July 1, 2015, meets the requirements of Commission Rule R8-60(j), and (b) parties to request leave of the Commission to file comments on DNCP's July 1 filing.

In support of this motion, the Public Staff shows the following:

1. On July 20, 2015, the Commission approved revisions to Commission Rule R8-60 that substantially changed the requirements surrounding the contents and review of updates to IRPs filed in odd-numbered years. While the requirements generally lessened the amount of material to be filed and the review necessary, the Public Staff is tasked with conducting a compliance review of each filing. Moreover, revised Rule R8-60 allows any party to seek leave of the Commission to file comments on issues that it believes merit further examination.

2. The Public Staff has generally completed its compliance review of DNCP's filing.

3. To determine whether there are any issues the Public Staff would raise with the Commission in a request to file comments, the Public Staff issued data requests to DNCP, to which DNCP responded promptly. Due to the press of business, the Public Staff has not completed review of these responses.

4. Revised Rule R8-60(k) provides that the Public Staff has 60 days after the filing of an update report to file its report on compliance with R8-60(j), and the Public Staff believes that the 60 days would also apply to the period that a party has to seek leave of the Commission to file comments.

5. The Public Staff requests: (a) that it be granted an additional 21 days to complete its compliance review to September 21, 2015, and (b) that the time for any party to seek leave to file comments on DNCP's July 1 filing be extended to the same date.

6. The Public Staff has notified DNCP of this request and it does not object.

THEREFORE, the Public Staff respectfully prays:

1. That the Commission issue an order granting the Public Staff an additional 21 days to complete its compliance review of DNCP's IRP update to September 21, 2015, and extending the time for any party to seek leave to file comments on DNCP's July 1 filing to the same date; and

2. For such other and further relief as the Commission may deem just and proper.

Respectfully submitted, this the 27th day of August, 2015.

PUBLIC STAFF
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Executive Director

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Electronically submitted
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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing Motion for Extension on each of the parties of record in this proceeding or their attorneys of record either by electronic delivery or by deposit in the U.S. Mail, postage prepaid.

This the 27th day of August, 2015.

Electronically submitted
s/ Lucy E. Edmondson