

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. M-100, SUB 164

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	MOTION OF THE PUBLIC
Consideration of the Federal Funding	)	STAFF FOR EXTENSION OF
Available Under the Infrastructure	)	TIME
Investment and Jobs Act	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves the North Carolina Utilities Commission (Commission) to extend the time to file reply comments in the above-referenced docket to and including Thursday, April 28, 2022. In support thereof, the Public Staff respectfully shows the Commission the following:

1. On February 14, 2022, the Commission issued its Order Allowing Comments Regarding Federal Funding for Utility Service in North Carolina in the above-captioned docket. Among other things, the order made Duke Energy Progress, LLC (DEP); Duke Energy Carolinas, LLC (DEC); Virginia Electric and Power Company d/b/a Dominion Energy North Carolina (DENC); Piedmont Natural Gas Company, Inc. (Piedmont); Public Service Company of North Carolina, Inc. d/b/a Dominion Energy North Carolina (PSNC); AQUA North Carolina, Inc. (Aqua); and Carolina Water Service, Inc. of North Carolina (CWSNC) parties of record in this proceeding and established March 15, 2022, as the deadline for parties to file comments, and April 14, 2022, as the deadline for parties to file reply comments.

2. Thereafter, petitions to intervene were filed by North Carolina Sustainable Energy Association (NCSEA); Fayetteville Public Works Commission (FPWC); Carolina Utility Customers Association, Inc. (CUCA); Carolinas Clean Energy Business Association (CCEBA); Carolina Industrial Group for Fair Utility Rates I, II, and III (collectively, CIGFUR); ChargePoint, Inc. (ChargePoint); Frontier Natural Gas Company (Frontier); and EVgo Services LLC (EVgo). Between February 18, 2022, and March 28, 2022, the Commission issued orders granting all the petitions to intervene.

3. On March 15, 2022, initial comments were filed by Aqua, CIGFUR, ChargePoint, CUCA, CWSNC, DEC and DEP, DENC, EVgo, NCSEA, Piedmont, and PSNC. CCEBA filed initial comments on March 16, 2022.

4. Due to the press of business, the Public Staff is unable to complete its reply comments by the deadline set by the Commission. Accordingly, the Public Staff requests a two-week extension of time for all parties to file reply comments in this proceeding.

5. Due to the late timing of this request and the large number of parties involved in this proceeding, the Public Staff was unable to contact the other parties to ascertain their positions on the Public Staff's request.

WHEREFORE, the Public Staff requests that the Commission enter an order granting a two-week extension, to and including Thursday, April 28, 2022, for all parties to file reply comments in this proceeding.

This the 14th day of April, 2022.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Dianna W. Downey  
Chief Counsel

Electronically submitted  
/s/ Megan Jost  
Staff Attorney

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### **CERTIFICATE OF SERVICE**

I certify that a copy of motion has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 14th day of April, 2022.

Electronically submitted  
/s/ Megan Jost