

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 140

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Biennial Determination of Avoided Cost)	MOTION FOR EXTENSION OF TIME
Rates for Electric Utility Purchases from)	
Qualifying Facilities – 2014)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, pursuant to North Carolina Utilities Commission (Commission) Rule R1-7, respectfully requests the Commission for an extension of time for filing proposed orders on the avoided costs filings made by Duke Energy Carolinas, LLC (DEC), Duke Energy Progress, LLC (DEP), and Dominion North Carolina Power (DNCP), (collectively, “the utilities”).

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

1. By Order issued on January 8, 2015, the Commission directed the utilities to file their proposed avoided cost rates and standard form contracts no later than March 2, 2015, in accordance with the determinations and guidance set forth in the Commission’s December 31, 2014 Order in this Docket. In addition, the Commission established a procedural schedule for other parties to file initial comments no later than Monday, May 4, 2015; reply comments no later than Monday, June 8, 2015; and proposed orders no later than Monday, July 6, 2015.

2. The utilities filed their proposed avoided cost rates and standard form contracts on March 2, 2015.

3. In response to a motion of the Public Staff, the Commission issued an order in the above-referenced docket on April 15, 2015: (1) extending the filing deadline for initial comments to June 8, 2015; (2) extending the filing deadline for reply comments to July 13, 2015; and (3) extending the filing deadline for proposed orders to August 10, 2015.

4. In response to a motion of DEC and DEP, the Commission issued an order in the above-referenced docket on July 24, 2015: (1) extending the filing deadline for reply comments to August 7, 2015; and (2) extending the filing deadline for proposed orders to September 4, 2015.

5. Due to the press of business and the complexity of the proceeding, the Public Staff requires additional time to finish its proposed order. Therefore, the Public Staff requests that the Commission issue an order extending the deadline for filing proposed orders from Friday, September 4, 2015, to Friday September 18, 2015.

6. The Public Staff has contacted the parties to this proceeding about this request and no parties have indicated that they have an objection to this motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order:

1. Extending the deadline for filing of proposed orders from September 4, 2015, to September 18, 2015; and
2. For such other and further relief as the Commission may deem just and proper.

This the 31st day of August, 2015.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Antoinette R. Wike
Chief Counsel

Electronically submitted
/s/ Tim R. Dodge
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
tim.dodge@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that a copy of this Motion for an Extension of Time 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 31st day of August, 2015.

Electronically submitted
/s/ Tim R. Dodge