

McGuireWoods LLP
501 Fayetteville St.
Suite 500
Raleigh, NC 27601
Phone: 919.755.6600
Fax: 919.755.6699
www.mcguirewoods.com

E. Brett Breitschwerdt
Direct: 919.755.6563

McGUIREWOODS

bbreitschwerdt@mcguirewoods.com

OFFICIAL COPY

Sep 15 2021

September 15, 2021

VIA Electronic Filing

Ms. Antonia Dunston, Interim Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: Petition for Approval of Revisions to Generator Interconnection Standards
Docket No. E-100, Sub 101*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding is *Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension of Time to File Reply Comments.*

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	DUKE ENERGY CAROLINAS, LLC AND
Petition for Approval of Revisions to)	DUKE ENERGY PROGRESS, LLC'S
Generator Interconnection Standards)	MOTION FOR EXTENSION OF TIME TO
)	FILE REPLY COMMENTS

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, “Duke Energy”), pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and move the Commission for a six-day extension of time through and including September 22, 2021, for Duke Energy and other interested parties to file reply comments pursuant to the Commission’s September 9, 2021 *Order Requesting Reply Comments*.

In support of the foregoing, Duke Energy shows the Commission the following:

1. On August 17, 2021, Duke Energy filed a Petition for Approval of Limited Modifications to the North Carolina Interconnection Procedures (“NCIP”) to Expand Transitional Cluster Study Eligibility (“Petition”). In the Petition, Duke Energy stated that it plans to open the queue reform transition process on September 1, 2021. The Petition proposes limited modifications to the NCIP that would allow an Interconnection Customer that is in the current interconnection queue as of the effective date of the queue reform revisions to be eligible to enter the Section 1.10.2 Transitional Cluster Study process if the Interconnection Customer has been issued a certificate of public convenience and necessity, or has submitted an offer into a new Resource Solicitation Process before the

close of the 60-day Transitional Cluster enrollment window. The latter change would potentially allow Duke Energy to complete the generator interconnection studies for a new Tranche 3 request for proposal solicitation (“RFP”) under the Competitive Procurement of Renewable Energy (“CPRE”) Program as part of the Transitional Cluster Study process.

2. On August 30, 2021, the Commission issued an *Order Requesting Comments on the Petition for Approval of Limited Modifications to the North Carolina Interconnection Procedures to Expand Transitional Cluster Study Eligibility*. The Order specifically requested comments on the Petition and proposed modifications included therein on or before Wednesday, September 8, 2021.

3. On September 8, 2021, the Carolinas Clean Energy Business Association (“CCEBA”) filed comments on the Petition advising the Commission that “CCEBA generally supports the Petition for Approval as well as the integration of Tranche 3 into the Transitional Cluster Study.” However, CCEBA also proposed several modifications to further expand Transitional Cluster eligibility for purposes of CPRE Tranche 3 that are more appropriately considered as part of the development of CPRE Tranche 3.

4. On that same day, the Public Staff also filed a Letter in Lieu of Comments stating that the Public Staff does not object to the Petition for Approval.

5. On September 9, 2021, the Commission issued an *Order Requesting Comments* allowing parties to file comments on the Petition on or before Thursday, September 16, 2021.

6. As part of the development of an accelerated CPRE Tranche 3 RFP, Duke Energy and the CPRE Independent Administrator have scheduled a stakeholder meeting

for Friday, September 17, 2021, to discuss issues concerning the CPRE Tranche 3 schedule and the integration of CPRE Tranche 3 into the Transitional Cluster Study process.

7. Recognizing that the majority of CCEBA's comments on the Petition concerned CPRE Tranche 3's integration with the Transitional Cluster Study process, Duke Energy believes regulatory efficiencies would be achieved by discussing the issues CCEBA raised in its initial comments during the upcoming stakeholder meeting prior to filing reply comments in this proceeding. Based on the foregoing, Duke Energy requests an extension of six days, up to and including September 22, 2021, to file reply comments on the proposed modifications to Transitional Cluster Study eligibility.

8. Counsel for Duke Energy has contacted counsel for parties of record regarding this Motion. The Public Staff, Dominion Energy North Carolina, the Attorney General's Office, Electricities, CCEBA, and North Carolina Sustainable Energy Association have advised that they do not object to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant this Motion for an extension of time through and including September 22, 2021, for Duke Energy to file reply comments on the proposed modifications to the Transitional Cluster Study process, and grant such other relief as the Commission deems just and proper.

Respectfully submitted, this the 15th day of September, 2021.

/s/Brett Breitschwerdt
Jack E. Jirak
Deputy General Counsel
Duke Energy Corporation
P. O. Box 1551 / NCRH 20
Raleigh, North Carolina 27602
Tel. 919.546.3257
Jack.jirak@duke-energy.com

E. Brett Breitschwerdt
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Tel. 919.755.6563
bbreitschwerdt@mcguirewoods.com

*Attorneys for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension of Time to File Reply Comments, as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 15th day of September, 2021.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6563
bbreitschwerdt@mcguirewoods.com

*Attorney for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*