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Phase 1 Report and the information gained from the report. The Commission scheduled the hearing for April 4, 2022.

3. On February 8, 2022, the Commission, in response to a motion filed by the Applicant, issued an Order Rescheduling the Hearing, moving the date of the hearing to March 2, 2022 to align with the release of the Phase 1 Report. The Commission's Order also required revised proposed orders and briefs to be filed by the parties no later than March 7, 2022.

4. During the March 2, 2022 evidentiary hearing, the Commission asked the parties to file supplemental briefs on the issue of whether Juno Solar could contract with Duke Energy Progress, LLC (DEP) to pay for a portion of the network upgrades, which are subject to the Federal Electric Regulatory Commission (FERC) crediting policy, in contrast with DEP's FERC approved Joint Open Access Transmission Tariff and in light of FERC's ruling in Docket No. ER21-1955-002, rejecting an Affected Systems Operating Agreement between DEP and American Beech Solar, LLC.

5. Because of the short deadline, the amount of testimony presented at the March 2, 2022 evidentiary hearing, and the complexity of the issues asked to be briefed, the Public Staff requires additional time to revise its proposed order and brief the requested issue. A two day extension would provide the Public Staff with sufficient time to revise the proposed order draft the supplemental brief.

6. The Public Staff therefore requests that the Commission extend the deadline for the parties to file proposed orders and briefs to March 9, 2022.

7. The Public Staff has contacted counsel for the Applicant and Duke and is authorized to represent that the neither party objects to this motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for the parties to file proposed orders and briefs on March 9, 2022.

This the 4th day of March, 2022.

PUBLIC STAFF
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Electronically submitted
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CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 4th day of March, 2022.

Electronically submitted
/s/ Robert B. Josey