Dec 03 2019

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 931 DOCKET NO. E-7, SUB 1032

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

Docket No. E-2, Sub 931))
In the Matter of)
Application by Carolina Power & Light, d/b/a)
Progress Energy Carolinas, Inc., for Approval)
of Demand-Side Management and Energy) MOTION FOR FURTHER
Efficiency Cost Recovery Rider Pursuant to) EXTENSION OF TIME TO FILE
N.C. Gen. Stat. §62-133.9 and Commission) REPLY COMMENTS
Rule R8-69)
)
Docket No. E-7, Sub 1032)
)
In the Matter of)
Application of Duke Energy Carolinas, LLC)
for Approval of New Cost Recovery)
Mechanism and Portfolio of Demand-Side)
Management and Energy Efficiency Programs)

NOW COME Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") and respectfully request that the Commission extend by an additional two weeks the time in which to file reply comments in the review of the demand-side management ("DSM")/energy efficiency ("EE") cost recovery mechanisms ("Mechanisms") of DEC and DEP, in the above-captioned dockets. In support of this motion, DEC and DEP show the following:

1. On February 6, 2019, the Commission issued an order in these dockets requesting comments by June 7, 2019, and reply comments by July 10, 2019, from the Public Staff and

intervenors addressing possible changes to the DEC and DEP Mechanisms for recovery of DSM/EE costs and incentives.

2. On May 30, 2019, the North Carolina Attorney General's Office ("AGO") filed a motion requesting that the dates for comments and reply comments be extended to July 10, 2019, and August 7, 2019, respectively. The Commission granted this Motion on May 31, 2019.

3. On July 10, 2019, initial comments on the DEC and DEP Mechanisms were filed by the AGO; the Public Staff; and by the Natural Resources Defense Council ("NRDC"), Southern Alliance for Clean Energy ("SACE"), Sierra Club, and South Carolina Coastal Conservation League ("SCCCL"), and North Carolina Sustainable Energy Association ("NCSEA").

4. The Public Staff sought and was granted a 30-day extension of time in which to file reply comments, so that the parties that filed initial comments, DEC, and DEP (collectively, the "Parties") could meet prior to filing reply comments to discuss where there may be consensus or potential avenues for resolution. A meeting of the Parties was held on August 15, 2019.

5. The Public Staff sought and was granted an additional 30-day extension of time in which to file reply comments, so that the Parties could conduct a second meeting, which was held on September 6, 2019.

6. DEC and DEP sought and were granted a 60-day extension of time in which to file reply comments, so that the Parties could conduct a third meeting, which was held on October 16, 2019. The Parties held additional meetings on October 30, 2019 and November 14, 2019 and have continued to conduct discussions by email.

7. To allow the Parties further time to meet and work toward potential resolution of some or all of the issues, DEC and DEP requests an additional two-week extension of the time by which reply comments must be filed.

8. Counsel for DEC and DEP has conferred with counsel for the Public Staff, AGO,

NRDC, SACE, Sierra Club, and SCCCL, and NCSEA, and they have no objection to a further two-week extension of the date by which reply comments must be filed.

9. Therefore, DEC and DEP respectfully request that the Commission extend the deadline for the filing of reply comments from December 6, 2019 to December 20, 2019.

Respectfully submitted this the 3rd day of December, 2019.

Electronically submitted /s/ Molly McIntosh Jagannathan Troutman Sanders LLP 301 South College Street, Suite 3400 Charlotte, North Carolina 28202 Tel: 704-998-4074 molly.jagannathan@troutman.com North Carolina State Bar No. 36931

ATTORNEYS FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC

Dec 03 2019

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Motion for Further Extension of Time in Which to File Reply Comments in Docket Nos. E-2, Sub 931 and E-7, Sub 1032 has been served by electronic mail (e-mail), hand delivery, or by depositing a copy in the United States Mail, first class postage prepaid, properly addressed to the parties of record.

This, the 3rd day of December, 2019.

Electronically submitted /s/ Molly McIntosh Jagannathan Troutman Sanders LLP 301 South College Street, Suite 3400 Charlotte, North Carolina 28202 Tel: 704-998-4074 molly.jagannathan@troutman.com North Carolina State Bar No. 36931

ATTORNEYS FOR DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC