

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 180

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Investigation of Proposed Net Metering Policy Changes ) JOINT MOTION FOR EXTENSION  
) OF TIME BY NC WARN AND THE  
) ENVIRONMENTAL WORKING  
) GROUP

NC WARN and The Environmental Working Group (“EWG”), by and through undersigned counsel, pursuant to North Carolina Utilities Commission (the “Commission”) Rule R1-7, hereby jointly request a forty-five (45) day extension on the deadlines for initial comments, petitions to intervene, and reply comments in the above-reference docket. In support of this motion, NC WARN and EWG show as follows:

1. On November 29, 2021, Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, the “Companies”) filed a Joint Petition for Approval of Revised Net Energy Metering Tariffs (the “Joint Petition”) in the above-referenced docket.

2. On January 10, 2022, the Commission entered an Order Requesting Comments. In the said Order, this Commission set the following deadlines:

- a. March 15, 2022 – deadline for initial comments;
- b. March 15, 2022 – deadline for petitions to intervene; and
- c. April 14, 2022 – deadline for reply comments.

3. NC WARN has diligently investigated and researched the Joint Petition, retained a consulting subject-matter expert, served data requests, and otherwise performed substantial work designed to prepare initial comments in the above-referenced docket.

4. EWG has recently intervened into the above-referenced docket, which petition to intervene was granted on February 17, 2022. EWG was not a participant in the Rate Design Study and was not aware of the proposed revisions to the Companies' net metering policy until earlier this year.

5. EWG is working diligently to analyze the requested revisions to net metering tariffs and the anticipated impacts if the changes are adopted. EWG is also working to carefully review data requests and responses to date to prepare high-quality comments for consideration by the Commission. The current deadline of March 15, 2022 for initial comments creates a significant challenge to that task, and given the relatively recent intervention of EWG, additional time would serve the ends of justice.

6. NC WARN and EWG therefore require additional time to prepare initial comments. This need for additional time is due, among other reasons, to the factual complexity of the issues presented by the Joint Petition; the importance and careful deliberation required by the issues presented by the Joint Petition; and the general press of business which has made it difficult to prepare high-quality comments by the deadline of March 15, 2022.

7. On February 18, 2022, undersigned counsel requested the position of all parties to the above-referenced docket on the extension requested herein.

Undersigned counsel is authorized to report that the following parties do not object to an extension of forty-five (45) days: the Attorney General's Office; Carolina Industrial Group I, II, and III ("CIGFUR"); and the Public Staff for the North Carolina Utilities Commission. Counsel for North Carolina Sustainable Energy Association ("NCSEA") indicated that his client would not object to an extension of thirty (30) days. Counsel for the Companies, as well as counsel for Vote Solar and Southern Alliance for Clean Energy, indicated that their respective clients would not object to an extension of fourteen (14) days.

8. If the extension sought herein is granted, the comments period (both initial and reply comments) would expire on May 30, 2022, which is over seven (7) months before the date on which the Companies propose for the new tariffs to become active (*i.e.*, January 1, 2023). Therefore, the 45-day extension requested herein would not prejudice any party

9. The present Motion constitutes the first extension request in the above-referenced docket by any party.

WHEREFORE, NC WARN and EWG respectfully request a 45-day extension on the deadline for initial comments, petitions to intervene and reply comments, so that the (a) new deadline for initial comments would be April 29, 2022, (b) the new deadline for petitions to intervene would be April 29, 2022, and (c) the new deadline for reply comments would be May 30, 2022.

This the 23rd day of February, 2022.

*[Signatures Follow on Next Page]*

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record in the above-referenced docket by email transmission.

This the 23rd day of February, 2022.

/s/ Matthew D. Quinn

Matthew D. Quinn