

DOCKET NO. E-100, SUB 128

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Investigation of Integrated Resource)	MOTION FOR
Planning in North Carolina – 2010)	EXTENSION OF TIME

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Robert P. Gruber, and moves for an extension of time until Friday, January 13, 2012, for the Public Staff and other intervenors to file comments on the annual reports submitted by the State's electric utilities on their Integrated Resource Plans (IRPs). In support of this motion the Public Staff respectfully shows unto the Commission:

AM
AG
7comm
Watson
Green
hoover
Wite
Sessions
Jones
Orison
Hodge
Hilburn

1. Commission Rule R8-60(h) requires each of the electric utilities¹ to make an IRP filing on September 1 of each year. In even-numbered years, the filing is to be a "biennial report," which must include the utility's IRP in its entirety, together with its Renewable Energy and Energy Efficiency Portfolio Standard (REPS) Compliance Plan, and extensive supporting information on the IRP as set out in Rule R8-60(i). In 2011 and other odd-numbered years, the required filing is an "annual report," which must include an updated load forecast, the current year's REPS Compliance Plan, and all significant amendments or revisions to the previous year's biennial report.

2. Annual reports were filed by the utilities on September 1, 2011, except that the North Carolina Electric Membership Corporation and GreenCo Solutions, Inc., pursuant to extensions of time granted by the Commission, filed their annual reports on September 19.

3. Rule R8-60(j) provides that the Public Staff and other intervenors may file comments on the utilities' annual reports within 60 days after the reports are filed. Accordingly, the deadline for the filing of comments is currently October 31, 2011.

4. Because of the large number of cases currently pending before the Commission, particularly the general rate case for Duke Energy Carolinas, LLC (Duke) (Docket No. E-7, Sub 989) and the merger case involving Duke and Progress Energy Carolinas, Inc. (Docket Nos. E-2, Sub 998 and E-7, Sub 986), the Public Staff is not in a position to file comments on the annual IRP reports by October 31 and is in need of a substantial extension of time.

5. The Public Staff expects to be able to file its comments by Friday, January 13, 2012.

¹ Under Rule R8-60(b), IRP filings must also be made by the North Carolina Electric Membership Corporation and "any individual electric membership corporation [EMC] to the extent that it is responsible for procurement of any or all of its individual power supply resources." For purposes of this motion, the term "utilities" includes those EMCs required to file IRP reports.

6. The Public Staff has notified the other parties to this docket by e-mail of the extension requested herein, and no party has objected.

WHEREFORE, the Public Staff prays:

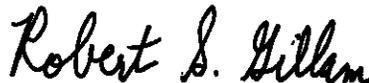
1. For an order extending the deadline for the Public Staff and other intervenors to file comments on the utilities' annual IRP reports to Friday, January 13, 2012; and

2 For such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 20th day of October, 2011.

PUBLIC STAFF
Robert P. Gruber
Executive Director

Antoinette R. Wike
Chief Counsel



Robert S. Gillam
Staff Attorney

430 North Salisbury Street
4326 Mail Service Center
Raleigh, North Carolina 27699-4326
Telephone: (919) 733-6110
Email: bob.gillam@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that a copy of this Motion for Extension of Time has been served on all parties of record or their attorneys, or both, by depositing a copy in the United States Mail, first class postage prepaid, properly addressed.

This the 20th day of October, 2011.

Robert S. Gillam

Robert S. Gillam