BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. SP-13695, SUB 1

| In the Matter of: |) | ACCION GROUP, LLC's, THE |
|-------------------------------|---|----------------------------|
| |) | CPRE INDEPENDENT |
| Orion Renewable Resources LLC |) | ADMINISTRATOR, RESPONSE TO |
| |) | AN ADDITIONAL REPLY BY |
| |) | ORION RENEWABLE |
| | , | RESOURCES LLC |

ACCION'S INTERIM LIST OF ATTORNEYS, WITNESSES AND CONSENT TO REMOTE HEARING

NOW COMES, Accion Group, LLC, the Independent Administrator for the Competitive Procurement of Renewable Energy Program ("CPRE" or "Program") (hereinafter "IA" or "Accion") who, in partial compliance with the North Carolina Utilities Commission (the "Commission") Order of April 14, 2021, in connection with the above captioned proceeding submits the following.

- 1. On April 14, 2021, the Commission issued an Order in this matter requiring the parties to comply with certain deadlines.
- 2. Since that Order, a Motion to Compel dated May 14, 2021 has been filed by Orion in connection with certain Data Requests submitted by Orion to the IA.
- 3. The IA through its counsel has indicated to the Commission it will respond to the Motion to Compel, not received by counsel until after May 14, 2021, by the week of May 24th, 2021.
- 4. Until that Motion is decided upon by the Commission, it is difficult for the parties to determine with certainty which witnesses may be necessary.
- 5. Accordingly, your IA submits the following, reserving the right to modify as needed following issuance of a ruling on the pending Motion to Compel:

ATTORNEYS

Jack P. Crisp, Jr., Esquire 603-225-5252 jack.crsip@crisplaw.com

Daniel C. Higgins 919-782-1441 dhiggins@bdppa.com

WITNESSES

Harold T. Judd 603-229-1644 hjudd@acciongroulllc.onmicrosoft.com

> David Ball 678-493-7097 dball@acciongroup.com

Phillip Layfield 804-748-4806 playfield@acciongroup.com

6. Accion consents to holding the expert witness hearing by remote means.

Respectfully submitted, Accion Group, LLC, Independent Administrator Through its Attorneys THE CRISP LAW FIRM, PLLC

Dated: May 21, 2021 By: <u>s/Jack P. Crisp, Jr.</u>

Jack P. Crisp, Jr., Esquire 15 North Main Street, Suite 208 Concord, NH 03301 603-225-5252

jack.crisp@crisplaw.com

CERTIFICATE OF SERVICE

I certify that a copy of Accion Group, LLC's, The CPRE Independent Administrator, Interim List and Consent to Remote Hearing has been served by electronic mail, hand delivery, or by depositing a copy in the United States mail, postage prepaid, properly addressed to counsel of record this the 21st day of May 2021.

Dated: May 21, 2021 <u>s/Jack P. Crisp, Jr.</u>

Jack P. Crisp, Jr., Esquire