

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. EMP-105, SUB 0**

<b>In the Matter of:</b>	)	
<b>Application of Friesian Holdings, LLC for a</b>	)	<b>JOINT MOTION OF</b>
<b>Certificate of Public Convenience and</b>	)	<b>FRIESIAN HOLDINGS, LLC</b>
<b>Necessity</b>	)	<b>AND THE NORTH</b>
	)	<b>CAROLINA SUSTAINABLE</b>
	)	<b>ENERGY ASSOCIATION</b>
	)	<b>FOR AN EXTENSION OF</b>
	)	<b>TIME TO FILE NOTICE OF</b>
	)	<b>APPEAL AND EXCEPTIONS</b>

**JOINT MOTION OF FRIESIAN HOLDINGS, LLC AND THE NORTH  
CAROLINA SUSTAINABLE ENERGY ASSOCIATION FOR AN EXTENSION  
OF TIME TO FILE NOTICE OF APPEAL AND EXCEPTIONS**

Friesian Holdings, LLC (“Friesian”) and the North Carolina Sustainable Energy Association (“NCSEA”) (Friesian and NCSEA, collectively, “Movants”), through the undersigned, jointly move for an extension of time in which to file a notice of appeal and exceptions to the North Carolina Utilities Commission’s (“Commission”) June 11, 2020 *Order Denying Certificate of Public Convenience and Necessity for Merchant Generating Facility* (“Order”). In support of this Motion, Movants show as follows:

1. Pursuant to N.C.G.S. § 62-90(a), the Movants may file notice of appeal and exceptions to the Order within 30 days of its issuance, “or within such time thereafter as may be fixed by the Commission, not to exceed 30 additional days.”
2. The current deadline for noticing appeal of the Order is July 11, 2020. The Movants seek an additional thirty (30) days extension of time to consider whether to appeal the Order.
3. The Movants request this extension of time because the Order impacts numerous issues of law, fact, and policy which are still under review by the Movants to

determine whether they should be considered for an appeal. Movants have diligently worked through the Order but anticipate needing additional time to adequately assess whether to file a Notice of Appeal and Exceptions.

4. Additionally, the COVID-19 Pandemic has complicated and made irregular NCSEA's normal methods to review the substantive issues contained within the Order with NCSEA's organizational staff and members.

5. The undersigned communicated the Movants' intent to file this Joint Motion to the parties in this docket and asked if any party objects. Duke Energy Progress, LLC, the Public Staff – North Carolina Utilities Commission, the North Carolina Electric Membership Corporation, and the North Carolina Clean Energy Business Alliance have each responded indicating they have no objection.

Wherefore, Friesian and NCSEA respectfully request an extension of an additional 30 days, up to and including August 10, 2020, in which any party may file a notice of appeal and exceptions to the Commission's June 11, 2020 Order.

Respectfully submitted this the 24th day of June, 2020.

/s/ Karen M. Kemerait  
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**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 24th day of June, 2020.

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