STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. EMP-117, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Shawboro East Ridge Solar,) MOTION OF THE
LLC, for a Certificate of Public) PUBLIC STAFF FOR
Convenience and Necessity to Construct a) EXTENSIONS OF TIME
150-MW Solar Facility in Currituck County,)
North Carolina

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the North Carolina Utilities Commission (Commission) to extend the deadline for the Public Staff's filing of testimony and exhibits in Docket No. EMP-117, Sub 0, and to likewise extend the deadline for the Applicant's filing of rebuttal testimony and exhibits. In support of this motion, the Public Staff respectfully shows the Commission the following:

- 1. On June 22, 2021, Shawboro East Ridge Solar, LLC (Applicant) filed an application pursuant to N.C. Gen. Stat. § 62-110.1 and Commission Rule R8-63 for a certificate of public convenience and necessity to construct a 150-MW_{AC} solar photovoltaic electric generating facility to be located in Currituck County, North Carolina.
- 2. On August 12, 2021, the Commission issued an Order Scheduling Hearings, Filing of Testimony, Establishing Procedural Guidelines, and Requiring Public Notice.

- On September 13, 2021, the Applicant filed a Motion for Extensions of Time.
- 4. On September 15, 2021, the Commission issued an Order Granting Extensions of Deadlines, extending the deadline for the direct testimony and exhibits of the Public Staff and other intervenors to October 5, 2021, and extending the deadline for the Applicant's rebuttal testimony and exhibits to October 21, 2021.
- 5. Because of the press of other ongoing dockets and deadlines, the Public Staff requires additional time to conduct a thorough investigation of the Applicant's application and testimony, and to draft its direct testimony. A two-week extension would provide the Public Staff with sufficient time to review the information in this docket and provide recommendations to the Commission.
- 6. The Public Staff therefore requests that the Commission extend the deadline for the Public Staff's filing of testimony and exhibits by two weeks, to October 19, 2021. The Public Staff further requests that the Commission extend the deadline for the Applicant's filing of rebuttal testimony and exhibits by a commensurate two weeks, to November 4, 2021.
- 7. The Public Staff has contacted counsel for the Applicant and is authorized to represent that the Applicant does not object to this motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for the Public Staff's filing of testimony and exhibits to October 19, 2021, and extending the deadline for the Applicant's filing of rebuttal testimony and exhibits to November 4, 2021.

This the 1st day of October, 2021.

PUBLIC STAFF Christopher J. Ayers Executive Director

Dianna W. Downey Chief Counsel

Electronically submitted /s/ Nadia L. Luhr Staff Attorney

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CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 1st day of October, 2021.

Electronically submitted /s/ Nadia L. Luhr