

FILED

OCT 15 2009

Clerk's Office  
N.C. Utilities Commission

DOCKET NO. E-100, SUB 124

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

OFFICIAL COPY

In the Matter of  
Investigation of Integrated Resource ) MOTION OF THE PUBLIC STAFF  
Planning in North Carolina - 2009 ) FOR AN EXTENSION OF TIME TO  
 ) FILE COMMENTS

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Robert P. Gruber, and respectively requests an extension of time to file comments in the above-captioned docket. In support, the Public Staff shows the following:

1. Under Commission Rule R8-60(h), each electric power supplier listed in subsection (b) of Rule R8-60 shall file with the Commission its then current integrated resource plan (IRP), along with all of the information required by subsection (i) of the rule, every two years (biennial report), starting September 1, 2008. By September 1 of each year in which the biennial report is not required to be filed, an annual report shall be filed containing an updated forecast and significant amendments or revisions to the most recently filed biennial report.

2. In addition, Commission Rule R8-67(b)(3) provides that "[a]ny electric power supplier subject to Rule R8-60 shall file its REPS [Renewable Energy and Energy Efficiency Portfolio Standard] compliance plan as part of its integrated resource plan filing, and the REPS compliance plan will be reviewed and approved pursuant to R8-60."

3. On or about September 1, 2009, the electric power suppliers subject to Rule R8-60 filed their annual reports and REPS compliance plans in Docket No. E-100, Sub 124.

4. Commission Rule R8-60(j) further provides that "within 60 days after the filing of each utility's annual report of amendments or revisions, the Public Staff or any other intervenor may file an integrated resource plan or report of its own as to any utility or may file an evaluation of or comments on the reports filed by the utilities, or both." Under Rule R8-60(j), the Public Staff's and intervenors' alternative IRPs or evaluation of or comments on the annual plans, are due on November 3, 2009.

5. Due to the press of other business, the Public Staff has been unable to proceed with its review of the annual plans and REPS compliance plans filed in Docket No. E-100, Sub 124. Although the 2009 filings are annual reports, as opposed to biennial reports, the Public Staff nonetheless desires additional time to review these detailed and voluminous filings adequately. Therefore, the Public Staff requests that the Commission issue an order extending the time for the Public Staff and other intervenors

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to file alternative IRPs or evaluations of or comments on the annual reports to January 15, 2010.

WHEREFORE, the Public Staff respectfully requests the Commission to enter an order extending the time for the Public Staff and all other intervenors to file alternative IRP annual reports, or evaluations of or comments on the 2009 annual reports, until January 15, 2010.

Respectfully submitted, this the 15th day of October, 2009.

PUBLIC STAFF  
Robert P. Gruber  
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CERTIFICATE OF SERVICE

I do hereby certify I have this day served a copy of the foregoing motion on each of the parties of record in this proceeding or their attorneys of record by causing a copy of the same to be deposited in the United States Mail, postage prepaid, properly addressed to each and/or by email.

This the 15th day of October, 2009.

  
Kendrick C. Fentress