

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 927
DOCKET NO. E-2, SUB 1287
DOCKET NO. E-7, SUB 1032
DOCKET NO. E-7, SUB 1261

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 927

In the Matter of)
Petition by Duke Energy Progress, LLC, for)
Approval of Modifications to Residential)
Service Load Control Rider)

DOCKET NO. E-2, SUB 1287

In the Matter of)
Application of Duke Energy Carolinas, LLC,)
for Approval of PowerPairSM Solar and)
Battery Installation Pilot Program Pursuant)
to Order of the North Carolina Utilities)
Commission)

**PUBLIC STAFF'S MOTION
FOR EXTENSION OF TIME**

DOCKET NO. E-7, SUB 1032

In the Matter of)
Petition by Duke Energy Carolinas, LLC,)
for Approval of Modifications to Residential)
Service Load Control Rider)

DOCKET NO. E-7, SUB 1261

In the Matter of)
Application of Duke Energy Carolinas, LLC,)
for Approval of PowerPairSM Solar and)
Battery Installation Pilot Program Pursuant)
to Order of the North Carolina Utilities)
Commission)

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Commission), by and through its Executive Director, Christopher J. Ayers, and respectfully requests the Commission to extend the time for filing comments, interventions, and protests in the above-captioned dockets to and including August 21, 2023. In support of this motion, the Public Staff shows as follows:

1. On June 21, 2023, Duke Energy Carolinas, LLC (DEC), and Duke Energy Progress, LLC (DEP and, together with DEC, Duke or the Companies), filed for approval of their solar and battery installation program entitled “PowerPairSM Solar and Battery Installation Pilot Program” in Docket Nos. E-2, Sub 1287, and E-7, Sub 1261 (PowerPair). On the same day, the Companies filed for approval pursuant to Commission Rule R8-68 of the related proposed energy efficiency (EE) program modifications to the Companies’ residential load control riders in Docket Nos. E-2, Sub 927 (EnergyWise), and E-7, Sub 1032 (Power Manager and, together with EnergyWise, the EE Program Modifications).

2. On June 29, 2023, the Commission issued its Order Requesting Comments in the PowerPair dockets, requiring that initial comments be filed by August 7, 2023, and that reply comments be filed by August 28, 2023.

3. Commission Rule R8-68(d)(2) provides that interested parties shall have 30 days from the date of the filing in which to intervene, file a protest, or file comments. The 30-day period for the Program Modifications expires on July 21, 2023.

4. As of the date of this filing, parties have intervened in the above-captioned dockets as follows:

- a. PowerPair: the North Carolina Sustainable Energy Association (NCSEA); Vote Solar and the Southern Alliance for Clean Energy (SACE), together; the Solar Energy Industries Association; NC WARN; the Attorney General's Office (AGO); North Carolina Rooftop Solar Installers; and Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III), together;
- b. EnergyWise: the Attorney General's Office (AGO); Carolina Utility Customers Association, Inc. (CUCA); the Natural Resource Defense Council; SACE; the Southern Environmental Law Center; the Environmental Defense Fund; and NCSEA; and
- c. Power Manager: NCSEA; CUCA; NC WARN; Public Service Company of North Carolina, Inc.; Environmental Defense Fund; SACE, the South Carolina Conservation League, Sierra Club, and the Natural Resources Defense Council, together; and CIGFUR III.

5. The Public Staff is reviewing these four related filings together and has been working diligently to serve data requests, review the Companies' responses, and otherwise conduct its investigation and prepare comments. Because of the press of ongoing dockets and deadlines, the Public Staff requires additional time to review the Companies' discovery responses and to conduct a

thorough assessment of the PowerPair program and the related EE Program Modifications. As such, the Public Staff requests that parties be permitted to file comments in these dockets up to and including August 21, 2023, such that the deadline for initial comments in each of the above-captioned dockets is uniform; and that parties have 21 days to file reply comments in the PowerPair dockets, up to and including September 11, 2023.

6. The Public Staff has conferred with counsel for the Companies, which do not object to this extension. In addition, the Public Staff has reached out to counsel of record for other intervenors on these dockets. SACE, Vote Solar, and the AGO have stated that they have no objection to this extension, and CIGFUR II, CIGFUR III, and NCSEA support this extension. Although the Public Staff has not received responses from every party, no party has objected to this extension.

7. THEREFORE, the Public Staff moves that the Commission grant an extension of time until the close of business on August 21, 2023, in which to file interventions, protests, or comments in the above-captioned dockets, and that the deadline for the PowerPair reply comments be extended until the close of business on September 11, 2023.

Respectfully submitted this the 12th day of July, 2023.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Lucy E. Edmondson
Chief Counsel

Electronically submitted
/s/ Anne M. Keyworth
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4326
Telephone: (919) 733-6110
Email: anne.keyworth@psncuc.nc.gov

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 12th day of July, 2023.

Electronically submitted
/s/ Anne M. Keyworth