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September 9, 2020

Ms. Kimberley A. Campbell
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

***RE: Motion for Extension of Time to Serve Proposed Record on Appeal
In the Matter of Application of Friesian Holdings, LLC for a
Certificate of Convenience and Necessity to Construct a 70-MW
Solar Facility in Scotland County, North Carolina
NCUC Docket No. EMP-105, Sub 0***

Dear Ms. Campbell:

Please find attached a Motion for Extension of Time to Serve Proposed Record on Appeal in the above referenced docket for an additional 30 days up to and including Wednesday, October 14, 2020.

If you have any questions or comments regarding this filing, please do not hesitate to contact me.

Thank you in advance for your assistance in this matter.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

pbb
Enclosure

cc: Parties of Record

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EMP-105, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

Application of Friesian Holdings, LLC for a)
Certificate of Convenience and)
Necessity to Construct a 70-MW Solar)
Facility in Scotland County, North Carolina)

MOTION FOR EXTENSION OF
TIME TO SERVE PROPOSED
RECORD ON APPEAL

NOW COME Friesian Holdings, LLC, the North Carolina Sustainable Energy Association, and the North Carolina Clean Energy Business Alliance (“Appellants”), pursuant to Rules 18(d)(2) and 27(c) of the North Carolina Rules of Appellate Procedure, and move for a thirty-day extension of time to serve the proposed record on appeal in the above-referenced matter. In support thereof, Appellants state as follows:

1. On 10 August 2020, Friesian Holdings, LLC, the North Carolina Sustainable Energy Association, and the North Carolina Clean Energy Business Alliance filed timely notices of appeal and exceptions to the 11 June 2020 Order in this proceeding pursuant to N.C. Gen. Stat. § 62-90(a).

2. The current deadline for serving the proposed record on appeal is 14 September 2020. The deadline may be extended by the Commission for up to thirty days pursuant to Rules 18(f) and 27(c)(1). Due to other workload of the attorneys involved in the case, the complexity of the issues, and the large record, additional time is required to prepare and serve the proposed record. For these reasons, Appellants request an additional 30 days up to and including Wednesday, 14 October 2020, to serve the proposed record on appeal.

3. Counsel for Friesian Holdings, LLC has communicated with counsel for the Public Staff and the North Carolina Electric Membership Corporation, who do not object to this request, and counsel for Duke Energy Progress, LLC, who consents to this request.

WHEREFORE, all Appellants respectfully request an extension of time of thirty days, up to and including Wednesday, 14 October 2020, in which to serve the proposed record on appeal on other parties in this proceeding.

Respectfully submitted this the 9th day of September, 2020.

/s/ Karen M. Kemerait
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Counsel for North Carolina Clean Energy Business
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/s/ Peter H. Ledford

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/s/ Benjamin W. Smith

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Counsel for North Carolina Sustainable Energy Association

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing Motion for Extension of Time to Serve Proposed Record on Appeal upon all parties of record by first class mail deposited in the U.S. mail, postage pre-paid, as well as by email transmission, as shown below:

<p>Christopher Ayers, Executive Director David T. Drooz, Staff Attorney Tim Dodge Megan Jost Public Staff-NC Utilities Commission 4326 Mail Service Center Raleigh, NC 27699-4300 David.drooz@psncus.nc.gov Tim.dodge@psncuc.nc.gov Megan.jost@psncus.nc.gov Chris.ayers@psncuc.nc.gov</p> <p><i>Counsel for Public Staff – NC Utilities Commission</i></p>	<p>Jack E. Jirak Associate General Counsel Duke Energy Corporation P.O. Box 1551/NCRH 20 Raleigh, NC 27601 Jack.jirak@duke-energy.com</p> <p><i>Counsel for Duke Energy Corporation</i></p>
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This the 9th day of September, 2020.

/s/ Karen M. Kemerait

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