



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

December 20, 2019

Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4000

Re: Docket Nos. E-2, Sub 931 and E-7, Sub 1032

Dear Ms. Campbell:

In connection with the above-captioned docket, I transmit herewith for filing on behalf of the Public Staff the Motion for Extension of Time.

By copy of this letter, I am serving all parties of record.

Sincerely yours,

/s/ Lucy E. Edmondson
Staff Attorney
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LEE/sld

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 931
DOCKET NO. E-7, SUB 1032

Docket No. E-2, Sub 931)	
)	
In the Matter of)	MOTION FOR FURTHER
)	EXTENSION OF TIME TO FILE
Application by Carolina Power & Light,)	REPLY COMMENTS
d/b/a Progress Energy Carolinas, Inc., for)	
Approval of Demand-Side Management)	
and Energy Efficiency Cost Recovery Rider)	
Pursuant to N.C. Gen. Stat. §62-133.9 and)	
Commission Rule R8-69)	
)	
Docket No. E-7, Sub 1032)	
)	
In the Matter of)	
)	
Application of Duke Energy Carolinas, LLC)	
for Approval of New Cost Recovery)	
Mechanism and Portfolio of Demand-Side)	
Management and Energy Efficiency)	
Programs)	

Now comes the Public Staff – North Carolina Utilities Commission (Public Staff) and respectfully requests that the Commission extend the time in which to file reply comments in the review of the demand-side management (DSM)/energy efficiency (EE) cost recovery mechanisms (Mechanisms) of DEC and DEP, in the above-captioned dockets. In support of this motion, the Public Staff shows the following:

1. On February 6, 2019, the Commission issued an order in these dockets requesting comments by June 7, 2019, and reply comments by July 10, 2019, from the Public Staff and intervenors addressing possible

changes to the DEC and DEP Mechanisms for recovery of DSM/EE costs and incentives.

2. On May 30, 2019, the North Carolina Attorney General's Office (AGO) filed a motion requesting that the dates for comments and reply comments be extended to July 10, 2019, and August 7, 2019, respectively. The Commission granted this Motion on May 31, 2019.

3. On July 10, 2019, initial comments on the DEC and DEP Mechanisms were filed by the AGO; the Public Staff; and by the Natural Resources Defense Council (NRDC), Southern Alliance for Clean Energy (SACE), Sierra Club, and South Carolina Coastal Conservation League (SCCCL), and North Carolina Sustainable Energy Association (NCSEA).

4. The Public Staff sought and was granted a 30-day extension of time in which to file reply comments so that the parties that filed initial comments, DEC, and DEP (collectively, the "Parties") could meet prior to filing reply comments to discuss where there may be consensus or potential avenues for resolution. A meeting of the Parties was held on August 15, 2019.

5. The Public Staff sought and was granted an additional 30-day extension of time in which to file reply comments so that the Parties could conduct a second meeting, which was held on September 6, 2019.

6. DEC and DEP sought and were granted a 60-day extension of time in which to file reply comments and then an additional two-week

extension so that the Parties could conduct a additional meetings on October 16, 2019, October 30, 2019, and November 14, 2019, as well as numerous discussions by email.

7. It appears that the Parties have resolved many of the issues where their positions differed, but the Parties seek additional time to resolve a remaining issue that is particularly complex. Due to the impending holidays, the Parties would not be able to resolve this issue until after the beginning of 2020.

8. If the Commission grants the requested extension, the Parties believe that they can meet by the first full week of January and be prepared to file revised Mechanisms for DEC and DEP no later than January 15, 2020.

9. Counsel for the Public Staff has conferred with counsel for DEC, DEP, the AGO, NRDC, SACE, Sierra Club, and SCCCL, and NCSEA and all consent to extension of the date by which reply comments must be filed to January 15, 2020.

10. Therefore, the Public Staff respectfully requests that the Commission extend the deadline for the filing of reply comments from December 20, 2019 to January 15, 2020.

Respectfully submitted this 20th day of December, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Lucy Edmondson
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 20th day of December, 2019.

Electronically submitted
/s/ Lucy Edmondson