

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EMP-108, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Application of American Beech Solar LLC,)	MOTION OF
for a Certificate of Public Convenience and)	THE PUBLIC STAFF
Necessity to Construct a 140-MW Solar Facility)	FOR EXTENSION OF TIME
in Halifax 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 filing of proposed orders and briefs in the above-captioned docket. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On January 28, 2020, American Beech 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 110-MW_{AC} solar photovoltaic electric generating facility to be located in Halifax County, North Carolina.¹

2. Most recently in this docket, on August 26, 2022, the Commission issued its Order Requiring Proposed Orders, requiring that the parties to the

¹ In testimony filed on May 24, 2022, Applicant witness Michael Stanton explained that changes to the planned facility resulted in an increase from 110 MW to 140 MW.

proceeding file proposed orders or briefs on or before 30 days from the issuance of the Order. This deadline for proposed orders falls on September 26, 2022.²

3. Because of the press of other ongoing dockets and deadlines, the Public Staff requires additional time to prepare a proposed order. A one-week extension would provide the Public Staff with sufficient time to thoroughly review the record in this proceeding and draft a proposed order for the Commission's consideration.

4. The Public Staff therefore requests that the Commission extend the deadline for all parties to file proposed orders or briefs by one week, to October 3, 2022.

6. The Public Staff has contacted counsel for the Applicant and is authorized to represent that the Applicant would consent to an extension.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for the filing of proposed orders or briefs to October 3, 2022.

² Thirty days from the issuance of the Commission's August 26, 2022 Order Requiring Proposed Orders falls on September 25, 2022, which is a Sunday. Therefore, pursuant to Commission Rule R1-27, the deadline would be pushed to the following Monday, September 26, 2022.

This the 23rd day of September 2022.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Lucy E. Edmondson
Chief Counsel

Electronically submitted
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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 23rd day of September 2022.

Electronically submitted
/s/ Nadia L. Luhr