

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 137

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 137)	
)	
In the Matter of)	
Integrated Resource Plan Annual)	MOTION
Reports and Related 2013 REPS)	
Compliance Plans)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and moves that the Commission grant a second extension of time for the filing of initial comments on the 2013 Integrated Resource Plans (IRPs) and 2013 Renewable Energy and Energy Efficiency Portfolio Standard (REPS) Compliance Plans of the State’s electric power suppliers. In support of this motion the Public Staff respectfully shows the Commission:

1. On October 4, 2013, the Public Staff filed a Motion in Docket No. E-100, Subs 137 and 139 requesting that the Commission designate Tuesday, February 4, 2014, as the date for the Public Staff and other intervenors to file comments on the Sub 137 IRP and REPS Plans. On October 11, 2013, the Commission granted the motion and established Tuesday, February 4, 2014, as the date by which interested persons may file petitions to intervene in Subs 137 and 139, and as the date by which the Public Staff and other intervenors may file comments on the Sub 137 Plans and Sub 139 Reports. The Commission also

established Tuesday, February 18, 2014, as the date by which all parties may file reply comments in Subs 137 and 139.

2. The Public Staff has been working diligently to gather the data necessary for use in its comments on the investor-owned utilities' (IOUs') IRPs and REPS Plans. The Public Staff has sent three data requests with multiple items to each of the IOUs and has received full responses to the first set from all three companies, a response from Dominion North Carolina Power to its second request, and a response from Duke Energy Carolinas, LLC (DEC) to its third request.¹

3. On December 23, 2013, the Public Staff sent its second data request regarding the IRP of DEC, which included requests for the Present Value Revenue Requirements and supporting documentation for the CT/CC Portfolio under the "no carbon sensitivity" for both DEC and the Joint Planning scenario. The Public Staff requested a response to the entire 19-item data request by January 17, 2014. DEC has agreed to run the requested scenario, but has indicated that the response would take substantial time and would not be available until the end of February, 2014. The Public Staff believes that the requested information will provide critical information to fully evaluate DEC's IRP and also provide important information for development of the Public Staff's comments on the IRPs filed by the State's electric power suppliers.

4. Following receipt of the information, the Public Staff anticipates that it will need two weeks to finalize its comments. Therefore, the Public Staff

¹ The data requests were sent out on different days and are specific to each IOU. The companies are responding in a timely fashion.

requests that March 14, 2014, be established as the date by which interested persons may file petitions to and as the date by which the Public Staff and other intervenors may file comments on the Sub 137 Plans, and that the date for reply comments be extended to March 28, 2014.²

WHEREFORE, the Public Staff prays:

1. For an order setting the date for intervention and by which the Public Staff and other intervenors may file initial comments on the IRPs and REPS compliance plans as Friday, March 14, 2014, and Friday, March 28, 2014, for the filing of reply comments;

2. For such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 16th day of January, 2014.

PUBLIC STAFF
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Executive Director

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Electronically submitted
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² The Public Staff has filed a separate request for extension of time to file comments on the REPS compliance plans and reports filed in Docket No. E-100, Sub 139.

CERTIFICATE OF SERVICE

I 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 in accordance with Commission Rule R1-39 by United States Mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 16th day of January, 2014.

Electronically submitted
s/ Lucy E. Edmondson