

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

Docket No. E-2, Sub 1262
Docket No. E-7, Sub 1243

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Joint Petition of Duke Energy Carolinas,)
LLC and Duke Energy Progress, LLC) MOTION FOR
Issuance of Storm Recovery Financing) EXTENSION OF TIME
Orders)

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves the North Carolina Utilities Commission (Commission) to extend the time to file the Public Staff’s joint testimony and exhibits of Michael C. Maness and Michelle M. Boswell to Tuesday, December 22, 2020 subject to the condition described below. In support thereof, the Public Staff respectfully shows the Commission the following:

1. On October 26, 2020, Duke Energy Carolinas, LLC (DEC), and Duke Energy Progress, LLC (DEP, together Duke or the Companies) filed a Joint Petition for Financing Orders pursuant to N.C. Gen. Stat. § 62-172 (Joint Petition), seeking authority from the Commission to finance the storm recovery costs of the respective Companies due to Hurricanes Florence, Michael, and Dorian, and Winter Storm Diego.

2. On November 6, 2020, the Commission issued its Order Scheduling Hearing, Requiring Filing of Testimony, and Establishing Discovery Guidelines (Order).

3. The Order provides “[t]hat direct testimony and exhibits of the Public Staff and other intervenors shall be filed on or before December 21, 2020 and that the rebuttal testimony of DEC and DEP, if any, shall be filed on or before January 11, 2021.”

4. The Public Staff has worked diligently to meet the current December 21, 2020, deadline for the filing of its testimony. In fact, the Public Staff has already filed the testimony of six of its witnesses, and plans to file additional testimony before the close of business. However, Public Staff witness Maness has been suffering from a medical issue that has prevented the Public Staff from finalizing his and Ms. Boswell’s joint testimony. Consequently, the Public Staff is in need of an additional day, solely to file the joint testimony and exhibits of Maness and Boswell.

5. Based on the foregoing, the Public Staff requests an extension of time to Tuesday, December 22, 2020, to file the joint testimony and exhibits of Public Staff witnesses Maness and Boswell, and a corresponding extension to January 12, 2020, should be granted for the Companies to file its rebuttal testimony, solely as to the joint testimony and exhibits of Public Staff witnesses Maness and Boswell.

6. The undersigned counsel for the Public Staff has contacted counsel for the Companies and is authorized to represent that the Companies do not object to the extension requested by the Public Staff, provided the Commission grants a corresponding extension for Companies to file the rebuttal testimony of its witnesses as to the joint testimony and exhibits of Public Staff witnesses Maness and Boswell.

WHEREFORE, the Public Staff requests that the Commission enter an order (1) granting an extension until Tuesday, December 22, 2020, for the Public Staff to file the joint testimony and exhibits of Michael C. Maness and Michelle M. Boswell, and (2) granting an equivalent one-day extension to January 12, 2021 for the Companies to file its rebuttal testimony and exhibits as to the joint testimony and exhibits of Public Staff witnesses Maness and Boswell.

This the 21st day of December, 2020.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ William E. H. Creech
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 21st day of December, 2020.

Electronically submitted
/s/ William E. H. Creech