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April 19, 2021

## **VIA ELECTRONIC FILING**

Ms. Kimberley A. Campbell Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

RE: Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension
Docket Nos. M-100, Sub 158, E-2, Sub 1228, E-7, Sub 1236 & G-9 Sub 767

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Dear Ms. Campbell:

Please find enclosed for filing Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension in the above-referenced dockets.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Kendrick C. Fentress

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Enclosure

cc: Parties of Record

## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. M-100, SUB 158 DOCKET NO. E-2, SUB 1228 DOCKET NO. E-7, SUB 1236 DOCKET NO. G-9, SUB 767

In the Matter of:

DUKE ENERGY PROGRESS, LLC AND DUKE ENERGY CAROLINAS, LLC's MOTION FOR EXTENSION	
I	

NOW COME Duke Energy Progress, LLC ("DEP") and Duke Energy Carolinas, LLC ("DEC") (collectively, the "Companies") and, pursuant to Commission Rule R1-7, respectfully move the North Carolina Utilities Commission (the "Commission") for a seven-day extension of time, until April 27, 2021, to file their response to the Commission's *Order Reinstating Limited Residential Disconnection Moratorium*, issued on April 5, 2021 in Docket No. M-100, Sub 158. In support of this motion, the Companies show the following:

1. On March 10, 2020, Governor Roy Cooper issued Executive Order (EO) No. 116 declaring a State of Emergency in North Carolina to prevent the spread of the novel coronavirus. The EO stated it was effective immediately and "shall remain in effect until rescinded." EO No. 116 at § 25.

- 2. On March 13, 2020, DEC, DEP, and Piedmont Natural Gas Company, Inc. ("PNG") announced that they had voluntarily suspended disconnections for non-payment due to the hardships imposed on their customers as a result of the COVID-19 pandemic.
- 3. On March 19, 2020, in response to EO No. 116, the Commission issued an *Order Suspending Utility Disconnections for Nonpayment, Allowing Reconnection, and Waiving Certain Fees* in Docket No. M-100, Sub 158 (Public Utility Waiver Order).
- 4. On March 31, 2020, Governor Cooper issued EO No. 124. In pertinent part, EO No. 124 required public utilities to report implementation information weekly to the Commission.
- 5. On May 30, 2020, Governor Cooper issued EO No. 142, which extended the May 30, 2020 expiration date of EO No. 124 to midnight on July 29, 2020 and required public utilities to continue to report implementation information to the Commission on a monthly basis.
- 6. On July 29, 2020, the Commission issued an *Order Lifting Disconnection Moratorium and Allowing Collection of Arrearages Pursuant to Special Repayment Plans* (July 29, 2020 Order) in Docket Nos. M-100, Sub 158, E-2, Sub 1228, E-7, Sub 1236, E-22, Sub 583, G-5, Sub 617, and G-9, Sub 767.
- 7. On September 9, 2020, the Commission issued an *Order Finalizing COVID-19 State of Emergency Monthly Reporting Form* (September 9, 2020 Order), which requires that on a monthly basis or until further order of the Commission, all jurisdictional electric, natural gas, water, and wastewater public utilities, excluding resellers and Class C water and wastewater public utilities, shall submit the mandatory COVID-19 State of Emergency Monthly Reporting Form on or before the fifteenth day of the month following

the reporting period. The reporting made pursuant to the September 9, 2020 Order is ongoing; and the Companies recently submitted their information for the month of March on April 15.

- 8. On February 11, 2021, DEP, DEC, and PNG made an informational filing in Docket Nos. M-100, Sub 158, E-2, Sub 1228, E-2, Sub 1258, E-7, Sub 1236, E-7, Sub 1241, and G-9, Sub 767 stating their intent to broaden eligibility for the winter disconnection moratorium, established pursuant to Commission Rules R12-11(I)(6) and R12-10(h)(6), by extending eligibility to include all Low-Income Energy Assistance Program ("LIEAP") and Crisis Intervention Program ("CIP") beneficiaries. Additionally, the Companies stated they will grant eligible customers a 12-month payment arrangement on an opt-out basis for their outstanding balances prior to their April 2021 bill (for DEP and PNG) or their May 2021 bill (for DEC).
- 9. On February 23, 2021, the Commission issued an *Order Suspending Disconnections and Providing for Extended Special Repayment Plans for Certain Vulnerable Residential Customers and Requiring Door Hanger Notices* (February 23, 2021 Order), which is applicable to DEP, DEC, PNG, as well as Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC"), Public Service Company of North Carolina, Inc. ("PSNC"), Carolina Water Service, Inc. of North Carolina ("CWS"), and Aqua North Carolina, Inc. ("Aqua"). The February 23, 2021 Order required these utilities to cease residential customer disconnections due to nonpayment of utility bills, except where disconnection is necessary as a matter of safety or where requested by the customer, where the residential customer can establish that the customer is unable to pay for such service in full and that the customer's household is eligible to receive assistance

(whether funds are then available or not) from LIEAP, CIP, or the North Carolina Housing Opportunities and Prevention of Evictions ("NC HOPE") Program (Limited Residential Disconnection Moratorium) through March 31, 2021. The February 23, 2021 Order further required that DEC, DEP, DENC, PNG, PSNC, CWS, and Aqua place a service disconnect door-hanger at all residences within 24 to 36 hours prior to disconnection, advising residential customers of their options to avoid disconnection.

- 10. On March 24, 2021, the Commission issued an *Order Extending Door Hanger Notice Requirement* through June 30, 2021.
- 11. On April 5, 2021, the Commission issued an Order *Reinstating Limited Residential Disconnection Moratorium* through June 30, 2021 and requiring DEC and DEP to file comments, by no later than April 20, 2021, addressing allegations that the Companies' customer service representatives are not consistently providing correct information to customers regarding disconnections and mandatory payment plan arrangements. The report should also detail internal findings on the allegations and state all actions taken to correct any identified issues to ensure that customer service representatives are properly trained with respect to the Commission's latest requirements.
- 12. The Companies have been working diligently to prepare their report but require additional time to review their data with the data received from the Public Staff. Accordingly, the Companies respectfully request an additional seven (7) days, until April 27, 2021, to file their response. The Companies would not object to the time for other parties to file comments in reply to DEC's and DEP's responses be likewise extended a week. The Companies have notified the Public Staff about this requested extension, and the Public Staff did not object to it.

WHEREFORE, for the reasons set forth above, the Companies respectfully request that the Commission grant an extension of time to file their response from April 20, 2021 until April 27, 2021, and such other relief as the Commission deems just and proper.

Respectfully submitted, this the 19<sup>th</sup> day of April 2021.

Kendrick C. Fentress

Associate General Counsel

Kendrick C. Sertress

Duke Energy Corporation

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Attorney for Duke Energy Progress, LLC and Duke Energy Carolinas, LLC

## CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension, in Docket Nos. M-100, Sub 158, E-2, Sub 1228, E-7, Sub 1236 & G-9 Sub 767, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1<sup>st</sup> Class Postage Prepaid, properly addressed to parties of record.

This the 19<sup>th</sup> day of April, 2021.

Kendrick C. Fentress

Kendrick C. Sertress

Associate General Counsel

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