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March 2, 2022

VIA ELECTRONIC FILING

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

Re: **In the Matter of Investigation of Proposed Net Metering Policy Changes –
Docket No. E-100, Sub 180**

Dear Ms. Dunston:

I am writing on behalf of Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP” and together with DEC, the “Companies”), North Carolina Sustainable Energy Association (“NCSEA”), Vote Solar, and Southern Alliance for Clean Energy, (collectively, the “Responding Parties”) in response to the Joint Motion for Extension of Time by NC WARN and the Environmental Working Group, filed in this docket on February 23, 2022 (the “Motion”). The Motion requests a 45-day extension of time “on the deadlines for initial comments, petitions to intervene, and reply comments” in this docket. Paragraph 7 of the Motion goes on to characterize the position of certain other parties in this docket with respect to the request for extension. Specifically, the Motion indicates that the Companies, Vote Solar, and SACE would “not object” to an extension of 14 days, while alleging that NCSEA would not object to an extension of 30 days.

The Responding Parties write to clarify their positions regarding the Motion. To be clear, the parties did not reach any agreement on an extension of time, nor do the parties agree on the need—if any—for an extension of time. Although NC WARN requested a 45-day extension, the Responding Parties do not believe there are any special circumstances or other grounds warranting an extension in this docket. Moreover, the Responding Parties provided counsel for NC WARN with “concerns” regarding any such extension. Although the Responding Parties maintain those concerns regarding the impact an extension will have on other dockets before the NCUC, the Responding Parties, in the spirit of compromise and good faith, expressed a willingness not to object to a request for a 14-day extension.¹ This limited extension will be less disruptive to other proceedings and aligns more closely to standard practice before the NCUC, while also accommodating NC WARN.

¹ It should be noted that the Application was filed approximately four months ago.

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Finally, NCSEA would like to clarify that it informed counsel for NC WARN that it would consent to an extension of 14 days and take no position on an extension of 30 days. The Responding Parties appreciate the opportunity to be heard on these matters. If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Ashley Cooper". The signature is fluid and cursive.

Ashley Cooper
*Attorney for Duke Energy Carolinas, LLC and
Duke Energy Progress, LLC*

s/Peter Ledford
Attorney for NC Sustainable Energy Association

s/David Neal
*Attorney for Southern Environmental Law Center
on behalf of Vote Solar and Southern Alliance for
Clean Energy*

JAC/gc
cc: Parties of Record