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June 10, 2022

## **VIA ELECTRONIC FILING**

Ms. A. Shonta Dunston 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 Joint Motion for Extension of Time Docket No. E-100, Sub 175

Docket No. E-100, Sub 17

Dear Ms. Dunston:

Enclosed for filing in the above-referenced docket is Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Motion for Extension of Time to File Proposed Orders.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kendrick C. Fentress

Kendrick C. Sertress

Enclosure

c: Parties of Record

## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 175

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2021

JOINT MOTION OF DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC FOR EXTENSION OF TIME TO FILE PROPOSED ORDERS

NOW COME Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP" and together with DEC, "the Companies), pursuant to Commission Rule R1-7, and move the North Carolina Utilities Commission ("Commission" or "NCUC") for a three-week extension of time through and including July 8, 2022, for all parties to file proposed orders and briefs as provided for in the Commission's May 16, 2022 *Order Requiring the Filing of Proposed Orders and Briefs*. In support of this Motion, the Companies respectfully show the Commission as follows:

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1. On August 13, 2021, the Commission issued its *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* ("Order Establishing Proceeding") establishing this proceeding as the Commission's biennial proceedings held pursuant to N.C. Gen. Stat. § 62-156(a) to implement Section 210 of the Public Utility Regulatory Policies Act of 1978. The Order Establishing Proceeding directed the Companies and other utilities to file initial statements and updated avoided cost rates and tariffs on November 1, 2021 ("Initial Filings"). This Order also provided for filing of initial comments and exhibits by the North Carolina Utilities Commission—Public Staff") and other parties in response to the Initial Filings on or before

February 9, 2022, reply comments by March 11, 2022, and proposed orders on a date to be established by further order of the Commission.

- 2. On November 1, 2021, the Companies, along with Dominion Energy North Carolina ("DENC"), each made their Initial Filings in the docket. On November 22, 2021, DEC filed a revised Exhibit 12 "New ESS Retrofit Avoided Cost Rates," and on January 7, 2022, DENC filed a revised Exhibit 7 "Avoided Capacity Rates."
- 3. On February 2, 2022, the North Carolina Sustainable Energy Association ("NCSEA"), Carolinas Clean Energy Business Alliance. ("CCEBA"), and the Southern Alliance for Clean Energy ("SACE") jointly filed a motion requesting that the Commission extend by 15 days the filing deadlines for comments established in the Commission's *Order Establishing Proceeding*.
- 4. On February 7, 2022, the Commission issued its Order extending the time for all parties to file their comments and exhibits and establishing February 24, 2022 as the deadline for the filing of these comments and exhibits. The Order also established March 28, 2022 as the deadline for the filing of reply comments.
- 5. On February 24, 2022, the Public Staff, SACE, and Appalachian Voices each filed initial comments; and NCSEA and Carolinas Clean Energy Business Alliance ("CCEBA") filed joint comments.
- 6. On March 24, 2022, the Companies filed a joint motion for a four-day extension of time to file reply comments.
- 7. On March 25, 2022, the Commission issued its Order extending the time for all parties to file reply comments, establishing April 1, 2022 as the new due date.
  - 8. On April 1, 2022, the parties filed reply comments.

- 9. On May 16, 2022, the Commission issued its *Order Requiring the Filing of Proposed Orders and Briefs* on or before June 17, 2022.
- 10. The Companies are working diligently to prepare their joint proposed order but, due to the press of other business, require additional time to complete it. The Companies respectfully request an extension of three weeks, up to and including July 8, 2022, for all parties to file proposed orders and briefs in the docket.
- 11. The Companies submit that no party will be prejudiced by the requested extension, and the duration of time requested is reasonable.
- 12. Counsel for the Companies has contacted counsel for all parties of record regarding this Motion via telephone and/or electronic mail. No party has advised that it objects to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant this Motion for an extension of time through and including July 8, 2022 for parties to file proposed orders in this proceeding, and such other relief as the Commission deems just and proper.

Respectfully submitted, this 10<sup>th</sup> day of June, 2022.

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

## **CERTIFICATE OF SERVICE**

I certify that a copy of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Joint Motion for Extension of Time to File Proposed Orders, in Docket No. E-100, Sub 175 has been served on all parties of record either by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid.

This the 10<sup>th</sup> of June, 2022.

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Associate General Counsel

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