



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

August 30, 2019

Janice H. Fulmore, Deputy Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: Docket No. E-2, Sub 931 and E-7, Sub 1032

Dear Ms. Fulmore:

In connection with the above-captioned docket, I transmit herewith for filing on behalf of the Public Staff the Motion for Further Extension of Time.

By copy of this letter, I am serving all parties of record.

Sincerely yours,

/s/ Lucy E. Edmondson
Staff Attorney
lucy.edmondson@psncuc.nc.gov

LEE/sld

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Aug 30 2019

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 931
DOCKET NO. E-7, SUB 1032

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| | | |
|--|---|----------------------|
| DOCKET NO. E-2, SUB 931 |) | |
| |) | |
| In the Matter of |) | |
| Application by Carolina Power & Light Company, d/b/a |) | |
| Progress Energy Carolinas, Inc., for Approval of |) | |
| Demand-Side Management and Energy Efficiency |) | |
| Cost Recovery Rider Pursuant to G.S. 62-133.9 and |) | MOTION FOR FURTHER |
| Commission Rule R8-69 |) | EXTENSION OF TIME IN |
| |) | WHICH TO FILE REPLY |
| |) | COMMENTS |
| DOCKET NO. E-7, SUB 1032 |) | |
| |) | |
| In the Matter of |) | |
| Application of Duke Energy Carolinas, LLC, for |) | |
| Approval of New Cost Recovery Mechanism and |) | |
| Portfolio of Demand-Side Management and Energy |) | |
| Efficiency Programs |) | |

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully requests that the Commission extend by an additional 30-days time in which to file reply comments in the review of the demand-side management (DSM) / energy efficiency (EE) cost recovery mechanisms (Mechanisms) of Duke Energy Carolinas, LLC (DEC), and Duke Energy Progress, LLC (DEP) (collectively, Duke), in the above-captioned dockets. In support of this motion, the Public Staff shows as follows:

1. On 6 February 2019, the Commission issued an order in these dockets requesting comments by June 7, 2019, and reply comments by July 10, 2019, from the

Public Staff and intervenors addressing possible changes to the Duke Mechanisms for recovery of DSM/EE costs and incentives.

2. On May 30, 2019, the North Carolina Attorney General's Office (AGO) filed a motion requesting that the dates for comments and reply comments be extended to July 10, 2019, and August 7, 2019, respectively. The Commission granted this Motion on May 31, 2019.

3. On July 10, 2019, initial comments on the Duke Mechanisms were filed by the AGO, the Public Staff, the Natural Resources Defense Council (NRDC), Southern Alliance for Clean Energy (SACE), Sierra Club, and South Carolina Coastal Conservation League (SCCCL), together with the North Carolina Sustainable Energy Association (NCSEA).

4. The Public Staff sought and was granted a 30-day extension of time in which to file reply comments, so that the parties that filed initial comments and Duke could meet prior to filing reply comments to discuss where there may be consensus or potential avenues for resolution. A meeting of these parties was held on August 15, 2019, and a second meeting is scheduled for September 6, 2019, the current deadline for filing reply comments.

5. To allow these parties further time to meet and work toward potential resolution of some or all of the issues, the Public Staff requests an additional 30-day extension of the time by which reply comments must be filed.

6. The Public Staff has conferred with counsel for the AGO, NRDC, SACE, Sierra Club, and SCCCL, and NCSEA and all assent to a further 30-day extension of the

date by which reply comments must be filed.

7. Therefore, the Public Staff respectfully requests that the Commission extend the deadline for the filing of reply comments from September 6, 2019, to October 7, 2019.

Respectfully submitted this the 30th day of August, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Lucy Edmondson
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 30th day of August, 2019.

Electronically submitted
/s/ Lucy Edmondson