

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 175**

In the Matter of:)	
Biennial Determination of Avoided Cost)	JOINT MOTION FOR
Rates for Electric Utility Purchases from)	EXTENSION OF TIME
Qualifying Facilities – 2021)	
)	

JOINT MOTION FOR EXTENSION OF TIME

NOW COME the North Carolina Sustainable Energy Association (“NCSEA”), Carolinas Clean Energy Business Alliance. (“CCEBA”), and the Southern Alliance for Clean Energy (“SACE”) (NCSEA, CCEBA, and SACE, collectively, “Joint Movants”) pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission (“Commission”) for an extension of time through and including February 24, 2022 for parties to file initial comments pursuant to the Commission’s August 13, 2021 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* (“Order”) and also for an extension of time through and including March 28, 2022 for parties to file reply comments pursuant to the Order. In support of this motion, Joint Movants show the Commission as follows:

1. On August 13, 2021, the Commission issued the Order, which set the deadline for parties to file initial comments in this proceeding on February 9, 2022 and for parties to file reply comments in this proceeding on March 11, 2022.
2. Since the issuance of the Order, North Carolina House Bill 951 was ratified by the state legislature and signed into law by the governor resulting in the codified Session Law 2021-165 (“HB 951”).

3. HB 951 is a wide-ranging law that touches on a many parts of the regulation of electric utilities in North Carolina, including topics relevant to the determination of the avoided cost of energy and capacity rates in the state.

4. Since HB 951 was signed into law on October 13, 2021, the Commission has opened numerous dockets and stakeholder proceedings have begun on assorted topics as required by HB 951.

5. These new proceedings have both created a larger press of business in recent months for regular intervenors, including the Joint Movants, and opened further questions related to avoided cost methodology and determination which have availed themselves in this proceeding via recent data requests with responses not expected until near the deadline for the initial comments.

6. Joint Movants' request for extension of time is premised on two issues: the near-term press of business and outstanding data request responses which may affect the drafting of comments.

7. Accordingly, the Joint Movants anticipate needing time beyond the current deadlines of February 9, 2022 for initial comments and March 11, 2022 for reply comments and seek 15-day extensions for each comment period.¹²

8. No parties will be prejudiced by the requested extension dates.

¹ Joint Movants originally considered a 14-day extension of time for each comment period, but with another comprehensive stakeholder meeting scheduled for February 23, 2022, the Joint Movants determined that February 24, 2022, or 15 days after the initial deadline, was a more logical deadline date.

² 15 days after March 11, 2022 is a Saturday, so the reply comment deadline as proposed would move to the next business day, which is March 28, 2022.

9. The undersigned counsel has contacted counsel for all parties to the above-captioned proceedings regarding this motion and no party has indicated an objection to this Motion.

WHEREFORE, NCSEA, CCEBA, and SACE respectfully request that the Commission grant this Joint Motion in the above-captioned proceedings for initial comments to be due on February 24, 2022 and reply comments to be due on March 28, 2022 and for such further relief as the Commission deems just and proper.

Respectfully submitted, this the 2nd day of February 2022.

/s/ Benjamin W. Smith
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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

Respectfully submitted, this the 2nd day of February 2022.

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