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Feb 05 2021

February 5, 2021

VIA Electronic Filing

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: *Motion for Extension of Time*
Docket No. SP-100, Sub 35

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Progress, LLC is its *Motion for Extension of Time*.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. SP-100, SUB 35

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:
Request for Declaratory Ruling by)
Sunstone Energy Development LLC)
Regarding the Provision of Solar Energy)
and Energy Efficiency Service Within)
Fort Bragg)

**MOTION FOR
EXTENSION OF TIME**

NOW COMES Duke Energy Progress, LLC (“DEP” or “Movant”), and respectfully requests an order from the North Carolina Utilities Commission (“Commission”) for an extension of time up to and including February 26, 2021, to file comments in response to Sunstone Energy Development, LLC’s (“Sunstone”) December 9, 2020 Request for a Declaratory Ruling (“Petition”) filed in the above-captioned docket. DEP also requests a commensurate extension of time for parties to file reply comments up to and including March 12, 2021. In support of this motion, the Movant shows the following:

1. On December 8, 2020, Sunstone filed its Petition requesting a declaratory ruling from the Commission on three issues. On December 9, 2020, Sunstone filed a corrected version of its Petition.

2. On January 12, 2021, the Commission issued its Order Requesting Initial Comments on the Petition on or before February 12, 2021, and reply comments on or before February 26, 2021.

3. On January 13, 2021, DEP filed a Petition to Intervene. The Commission granted DEP's Petition to Intervene on January 21, 2021.

4. On January 21, 2021, DEP served its First Data Request and Request for Production of Documents on Sunstone. On February 1, 2021, Sunstone responded to DEP's Data Request. Sunstone's production of documents is ongoing.

5. DEP requests this extension of time due to time constraints associated with ongoing proceedings before the Commission, the complex issues of federal law raised in the Petition, and the ongoing discovery between the parties.

6. Counsel for DEP has spoken with counsel for Sunstone and the Public Staff regarding this Motion and both parties have authorized DEP to represent that they consent to the requested extensions.

WHEREFORE, the Movant respectfully requests that the Commission issue an order granting an extension of time up to and including February 26, 2021, to file initial comments and a commensurate extension of time up to and including March 12, 2021, to file reply comments.

Respectfully submitted, this the 5th of February, 2021.

/s/Lawrence B. Somers

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Counsel for Duke Energy Progress, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time*, as filed in Docket No. SP-100, Sub 35, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 5th day of February, 2021.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt

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