

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
2020 Biennial Integrated Resource)	MOTION OF THE PUBLIC
Plans and Related 2020 REPS)	STAFF FOR LEAVE TO FILE
Compliance Plans)	SUPPLEMENTAL
)	COMMENTS

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, respectfully moves the North Carolina Utilities Commission (“Commission”), pursuant to Commission Rule R1-7, to grant this Motion for Leave to File Supplemental Comments. In support of the Public Staff’s motion, it respectfully shows the following:

1. On November 19, 2021, the Commission issued its Order Accepting Integrated Resource Plans, REPS, and CPRE Program Plans with Conditions and Providing Further Direction for Future Planning, wherein on page 10 it directed Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, (collectively, "Duke") to “prepare and file one additional iteration of their Base Portfolio with Carbon Policy portfolios that assumes limited DS Hub Gas . . . and also relies on no more than eight years of forward natural gas prices before using fundamental forecast data for the remainder of the planning period.”

2. Pursuant to the Commission's Order, Duke filed a Supplemental Portfolio B on February 9, 2022.

3. The Public Staff has reviewed Supplemental Portfolio B and requests leave to file limited supplemental comments on Duke's February 9, 2022 filing within two weeks of a Commission order granting leave. The Public Staff believes that the Commission would benefit from further comments addressing this recent filing.

4. The Public Staff proposes that if it is granted leave to file supplemental comments, this leave to file supplemental comments be extended to all of the intervenors in this docket, and that Duke be allowed to file reply comments two weeks thereafter.

Therefore, in light of the foregoing, the Public Staff respectfully requests that the Commission grant this motion and allow the Public Staff and all other intervenors to file supplemental comments on Duke's Supplemental Portfolio or before 14 days from the date on which the Commission grants this motion, and that Duke be allowed to file reply comments two weeks thereafter.

Respectfully submitted this the 4th day of March, 2022.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Lucy E. Edmondson
Staff Attorney

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CERTIFICATE OF SERVICE

I certify that a copy of these reply comments has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 4th day of March, 2022.

Electronically submitted
/s/ Lucy E. Edmondson