

Kendrick C. Fentress Associate General Counsel

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March 24, 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's and Duke Energy Progress, LLC's Joint Motion for Extension of Time

**Docket No. E-100, Sub 175** 

Dear Ms. Dunston:

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

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

Sincerely,

Kendrick C. Fentress

Kendrick C. Sertress

cc: Parties of Record

Enclosure

## 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 FOR
EXTENSION OF TIME OF DUKE
ENERGY CAROLINAS, LLC AND
DUKE ENERGY PROGRESS, LLC

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 four (4) day extension of time through and including April 1, 2022, for all parties to file reply comments as provided for in the Commission's August 13, 2021 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* and its February 7, 2022 *Order Granting Joint Motion for Extension of Time*. In support of this Motion, the Companies respectfully show the Commission as follows:

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 the filing of initial comments by the North Carolina Utilities Commission – Public Staff

("Public Staff") and other parties in response to the Initial Filings on or before February 9, 2022, and reply comments by March 11, 2022.

- 2. On November 1, 2021, the Companies, along with Dominion Energy North Carolina, each made their Initial Filings in the docket. On March 1, 2022, New River Light and Power filed its Initial Filing, having obtained an extension from the Commission on December 20, 2021.
- 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") filed a joint motion for an extension of time through February 24, 2022 for parties to file initial comments and also for an extension of time through March 28, 2022 for parties to file reply comments.
- 4. On February 7, 2022, the Commission issued its Order granting the requested extension, establishing February 24, 2022 as the deadline for the filing of initial comments and 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 CCEBA filed joint initial comments.
- 6. The Companies are working diligently to prepare their reply comments but require additional time to discuss certain matters to try to gain a better understanding and potentially reach consensus. Based on the foregoing, the Companies respectfully request an extension of four days, up to and including April 1, 2022, for all parties to file reply comments in the docket.
- 7. The Companies submit that no party will be prejudiced by the requested extension.

8. 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 April 1, 2022 for parties to file reply comments in this proceeding, and such other relief as the Commission deems just and proper.

Respectfully submitted, this 24th day of March, 2022.

Kendrick C. Fentress

Associate General Counsel

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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 an Extension of Time, in Docket No. E-100, Sub 175, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 24th day of March, 2022.

Kendrick C. Fentress

Associate General Counsel

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