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Dec 13 2021

December 13, 2021

VIA Electronic Filing

Ms. A. Shonta Dunston, Interim Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: Motion for Extension of Time
Docket No. E-100, Sub 101*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC is their *Motion for Extension of Time to File Comments and Filings Regarding Risks Posed by Inverter-Based Resources* pursuant to the Commission's November 22, 2021 *Order Requiring Comments and Filings Regarding Risks Posed by Inverter-Based Resources*

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:sbc

Enclosure

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	DUKE ENERGY CAROLINAS, LLC
Petition for Approval of Revisions to)	AND DUKE ENERGY PROGRESS,
Generator Interconnection Standards)	LLC’S MOTION FOR EXTENSION
)	OF TIME TO FILE COMMENTS AND
)	FILINGS REGARDING RISKS POSED
)	BY INVERTER-BASED RESOURCES

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively the “Companies” or “Duke Energy”) pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and move the Commission for a one-week extension of time through and including December 22, 2021, for Duke Energy and Virginia Electric Power Company, d/b/a Dominion North Carolina Power (“Dominion”), to make the filings required by the Commission’s November 22, 2021 *Order Requiring Comments and Filings Regarding Risks Posed by Inverter-Based Resources* (the “Order”) in Docket No. E-100, Sub 101. The Companies further request that the Commission extend the deadline for parties to file comments on the responses of DEC, DEP, and Dominion by one week, through and including January 26, 2022.

In support of this motion, the Companies show the Commission as follows:

1. On November 22, 2021, the Commission issued the *Order* and directed the utilities file comments on or before December 15, 2021 addressing four questions regarding the use of inverter-based resources in North Carolina.

2. In addition to comments, the *Order* also directed the Companies to file, on or before December 15, 2021, a copy of the functional settings compliance document (the “Functional Settings Guidance Document”) referenced and incorporated into the Memorandum of Agreement between the Companies and Strata, along with an analysis of: (1) whether the Functional Settings Guidance Document is consistent with the recommendations in the Joint Report prepared by the North American Electric Reliability Corporation (“NERC”) and Texas Reliability Entity analyzing two disturbances that occurred on the bulk power system in Texas during the summer of 2021; and (2) whether the standards set in the Functional Settings Guidance Document are sufficient to ensure appropriate performance by generators.

3. The Companies have been working diligently to prepare responses to the Commission’s questions and to prepare requested analysis regarding the Functional Settings Guidance Document. However, the Companies require additional time to thoroughly address these issues and respectfully request that the Commission extend the response deadline applicable to all utilities by one-week to December 22, 2021. Correspondingly, the Companies request that the Commission extend the deadline for parties to file comments on the utilities’ filings by one week—from January 19, 2022 to January 26, 2022.

4. Counsel for Duke Energy has contacted counsel for parties of record regarding this Motion. Although not all counsel have responded, as of the time of this filing, no counsel for any party has indicated any objection to the Companies’ motion. The Public Staff, Dominion, Carolinas Clean Energy Business Association, and the Southern Alliance for Clean Energy have each advised that they support the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant this Motion for a one-week extension of time through and including December 22, 2021, for the utilities to file the comments in response to the Commission's *Order*, through and including January 26, 2022 for parties to file comments responsive to the utilities' filings, and grant such other relief as the Commission deems just and proper.

Respectfully submitted, this the 13th day of December, 2021.

E. Brett Breitschwerdt

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*Attorneys for Duke Energy Carolinas, LLC
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time to File Comments and Filings Regarding Risks Posed by Inverter-Based Resources* as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 13th day of December, 2021.

s/E. Brett Breitschwerdt

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