

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 101
DOCKET NO. E-100, SUB 158

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 101)	
In the Matter of)	
Petition for Approval of Revisions to)	CCEBA’S MOTION FOR EXTENSION
Generator Interconnection Standards)	OF TIME TO FILE COMMENTS
)	REGARDING DUKE ENERGY’S
DOCKET NO. E-100, SUB 158)	COMPREHENSIVE WAIVER REQUEST
In the Matter of)	AND PROPOSED QF ELIGIBILITY
Biennial Determination of Avoided Cost)	QUALIFICATIONS FOR ESS RETROFIT
Rates for Electric Utility Purchases from)	
Qualifying Facilities – 2018)	

NOW COMES Carolinas Clean Energy Business Association (“CCEBA”), Intervenor in this Docket, and moves the Commission pursuant to NCUC Rule R1-7(a)(5) for a one week extension of time to comply with the Commission’s September 15, 2021 Order directing Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively “Duke Energy”) to file by September 30, 2021 (1) a comprehensive waiver request reflecting all waivers that are needed from the North Carolina Interconnection, in order to comply with the Commission’s directive to move ahead with an enrollment window for the ESS Retrofit Study Process; and (2) the procedure for how a QF establishes eligibility for the avoided cost rate or methodology applicable to the output of the energy storage addition. The September 15, 2021 Order required responsive comments to be filed on or before October 14, 2021, with Duke Energy’s responses due on or before October 21, 2021. Duke Energy filed its proposal on September 30, 2021.

In support of this motion, undersigned counsel states that the press of business before this Commission in several dockets, as well as dockets in South Carolina with approaching deadlines make the Commission's original date for comments difficult to meet. CCEBA has been gathering input and comments from its member organizations and anticipates being able to file substantive comments on or before October 21, 2021.

Undersigned counsel has requested consent from all parties of record in these dockets and has received no objections. Duke Energy, NCEMC, Public Power, NC WARN, Southern Alliance for Clean Energy, the North Carolina Sustainable Energy Association, Strata Solar, the Public Staff, and the Office of the Attorney General have consented to the relief requested. Duke Energy has requested that its deadline for reply comments be extended until November 5, 2021, due to other pending deadlines. CCEBA has no objection and incorporates that request into this motion.

WHEREFORE, CCEBA respectfully requests that the Commission extend the time for parties to file comments on Duke Energy's filing until October 21, 2021 and the deadline for Duke to file reply comments be extended until November 5, 2021.

Respectfully requested, this 14th day of October 2021.

/s/ John D. Burns

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CERTIFICATE OF SERVICE

I certify that a copy of CCEBA’S MOTION FOR EXTENSION OF TIME TO FILE COMMENTS REGARDING DUKE ENERGY’S COMPREHENSIVE WAIVER REQUESTS AND PROPOSED QF ELIGIBILITY QUALIFICATIONS FOR ESS RETROFIT in Dockets No. E-100, Sub 101 and E-100, SUB 158, has been served by electronic mail or by depositing a copy in the United States mail, postage prepaid to parties of record.

This 14th day of October 2021.

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