STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, Sub 931 DOCKET NO. E-7, SUB 1032

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In the Matter of () Application of Duke Energy Progress, LLC, for () Approval of Demand-Side Management and () Energy Efficiency Cost Recovery Rider () Pursuant to N.C.G.S. § 62-133.9 and () Commission Rule R8-69 () ATTORNEY GENERAL'S OFFICE MOTION FOR EXTENSION OF TIME

DOCKET NO. E-7, SUB 1032

In the Matter of) Application of Duke Energy Progress, LLC, for) Approval of New Cost Recovery Mechanism) and Portfolio of Demand-Side Management and) Energy Efficiency Programs)

The North Carolina Attorney General's Office ("AGO"), through the undersigned, moves for an extension of time for the filing of comments and reply comments addressing possible changes to the mechanisms by which Duke Energy Progress, LLC, ("DEP") and Duke Energy Carolinas, LLC ("DEC") (together "Duke') recover their demand-side management and energy efficiency ("DSM/EE") costs and incentives. In support of this request, the Attorney General states the following:

1. On 6 February 2019, the Commission issued an order in these

dockets requesting comments and reply comments from the Public Staff and

intervenors addressing possible changes to the DEP and DEC Mechanisms for

recovery of DSM/EE costs and incentives. The deadline for initial comments is 7

June 2019 and the deadline for reply comments is 10 July 2019. In addition to other relevant issues, the Commission directed parties to address the following topics:

(a) Whether the incentives in the current DEP and DEC Mechanisms are producing significant DSM and EE results.
(b) Whether the customer rate impacts of the DSM/EE riders are reasonable and appropriate.
(c) Whether overall DSM/EE program portfolio performance targets should be adopted.

2. The AGO has contracted with Strategen Consulting to help the

AGO review the mechanisms and address the Commission's questions, and we

require additional time to complete the review and prepare comments.

Therefore, the AGO requests an extension of the deadline for all intervenors to

file initial comments on or before Wednesday, 10 July 2019. Additionally, the

AGO requests a like extension for the deadline to file reply comments on or

before Wednesday, 7 August 2019.

3. The undersigned have communicated with counsel for Duke, the Public Staff, the City of Fayetteville, the Pork Council, Natural Resources Defense Council, Southern Alliance for Clean Energy and the Sierra Club, the Carolina Utility Customers Association, and Carolina Industrial Group for Fair Utility Rates II, and each have stated that they do not object to the requested extension. Further, other intervenors were contacted by email and did not respond with an objection to the requested extension.

Wherefore, the AGO respectfully requests an extension of approximately 4 weeks, up to and including Wednesday 10 July 2018, for the filing of initial

May 30 2019

comments, and a like extension up to and including Wednesday 7 August 2019

for the filing of reply comments in these matters.

Respectfully submitted this the 30th day of May, 2019.

Electronically submitted /s/ Jennifer T. Harrod Special Deputy Attorney General Telephone: (919) 716-6692 <u>iharrod@ncdoj.gov</u>

/s/ Teresa L. Townsend Special Deputy Attorney General Telephone: (919) 716-6980 <u>ttownsend@ncdoj.gov</u> /s/ Margaret A. Force Assistant Attorney General Telephone: (919) 716-6053 pforce@ncdoj.gov

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CERTIFICATE OF SERVICE

The undersigned certifies that she has served a copy of the foregoing MOTION OF THE ATTORNEY GENERAL'S OFFICE FOR EXTENSION OF TIME upon the parties of record in this proceeding by email or by depositing a copy of the same in the United States Mail, postage prepaid, this the 30th day of May, 2019.

> Electronically Submitted /s/ Margaret A. Force Assistant Attorney General