

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

**DOCKET NO. E-2, SUB 1287
DOCKET NO. E-7, SUB 1261**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, Sub 1287)	
)	
In the Matter of:)	
Application of Duke Energy)	
Progress, LLC)	
For Approval of Smart \$aver Solar)	ATTORNEY GENERAL'S OFFICE
Energy Efficiency Program)	MOTION FOR
)	AN EXTENSION OF TIME
DOCKET NO. E-7, Sub 1261)	
)	
In the Matter of:)	
Application by Duke Energy)	
Carolinas, LLC)	
for Approval of Smart \$aver Solar)	
Energy Efficiency Program)	

The North Carolina Attorney General's Office ("AGO"), through the undersigned counsel, moves for an extension of fourteen (14) days for the filing of petitions to intervene, protests, or comments addressing applications by Duke Energy Progress, LLC, ("DEP") and Duke Energy Carolinas, LLC ("DEC") (together "Duke") for the approval of the Smart \$aver Solar Energy Efficiency Program. In support of this request, the Attorney General states the following:

1. On December 16, 2021, Duke filed applications in the above captioned docket for approval of the Smart \$aver Solar Energy Efficiency Program.

2. Under Commission Rule R8-68(d)(2), parties are given 30 days from the filing of an application for a new demand-side management or energy efficiency program to file petitions for intervention pursuant Commission Rule R1-19, protests pursuant Commission Rule R1-6, or comments. The filing electric utility has 10 days to respond to any such petitions, protests, or comments.

3. On January 12, 2022, the Public Staff filed a motion for an extension of time seeking a 45-day extension for the filing of petitions to intervene, protests, or comments.

4. The Commission granted the Public Staff's request on January 13, 2022. Pursuant to that order, the current deadline for interested parties to file petitions for intervention, protests, or comments in these dockets is March 1, 2022. Duke is permitted to respond to any such filing within 10 days.

5. The AGO has been working diligently to review the applications, to review the comprehensive data requests that have been served on Duke and Duke's responses, and to discuss the applications with other parties in these dockets. The proposed programs are complex and of great public interest. The requested extension would give all parties sufficient time to fully evaluate the proposals and file thorough comments with the Commission.

6. In addition, the programs are intricately linked with the revised Net Energy Metering tariffs proposed by Duke in Docket No. E-100, Sub 180. The current deadline for the filing of petitions to intervene and initial comments in that docket is March 15, 2022. The requested extension would better align the timelines in these dockets.

7. The requested effective date for the programs is January 1, 2023; therefore, the AGO believes that the requested extension would still allow the Commission sufficient time to review all filings without impeding implementation of the programs if approved.

8. The undersigned have communicated with counsel for Duke, the Public Staff, the North Carolina Sustainable Energy Association, Vote Solar, the Southern Alliance for Clean Energy, the Solar Energy Industries Association, and NC WARN. All have stated that they do not object to the requested extension.

Wherefore, the AGO respectfully requests an extension of fourteen (14) days, for the filing of initial comments, protests, and petitions for intervention in these matters. Under this revised schedule, those filings must be made by the close of business on March 15, 2022 and Duke shall have 10 days to respond to any such filing.

Respectfully submitted this the 24th day of February, 2022.

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CERTIFICATE OF SERVICE

The undersigned certifies that she has served a copy of the foregoing ATTORNEY GENERAL'S OFFICE MOTION FOR AN EXTENSION OF TIME upon the parties of record in this proceeding by email, this the 24th day of February, 2022.

/s/
Tirrill Moore
Assistant Attorney General