

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-2, SUB 936

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Request by Duke Energy Progress, LLC, for	)	PUBLIC STAFF'S
Approval of Modifications to Residential Home	)	MOTION FOR
Energy Improvement Program	)	EXTENSION OF TIME

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and respectfully requests the Commission to extend the time for filing its comments in the above-captioned docket to and including December 2, 2015. In support of this motion, the Public Staff shows as follows:

1. On October 2, 2015, Duke Energy Progress, LLC (DEP), filed its request for approval of modifications to its Home Energy Improvement Program.

2. Substantial modifications of an energy efficiency (EE) program are subject to Commission approval under Rule R8-68((b)(6), R8-68(c)(1) and (c)(3), and Attachment A to the January 20, 2015, Order Approving Revised Cost Recovery and Incentive Mechanism and Granting Waivers (Revised Mechanism) in Docket No. E-2, Sub 931. The October 2, 2015, filing by DEP in the present docket constitutes substantial modifications requiring advance Commission approval.

3. Rule R8-68(d)(2) provides that interested parties shall have 30 days from the date of the filing in which to intervene, file a protest, or file comments.

4. The Public Staff has been conducting discovery in cooperation with DEP, and received the most recent data responses yesterday (October 29, 2015). The Public Staff expects to issue a follow-up data request. Furthermore, this EE program presents an unusual situation because the existing program and the proposed modified program have Total Resource Cost (TRC) test scores below 1.0, indicating a lack of cost effectiveness, although DEP anticipates that pricing trends will improve the cost effectiveness over time. Because of these complications and the ongoing review of discovery by the Public Staff, the Public Staff requests a 30 day extension, to December 2, 2015, in which the Public Staff and any other interested parties may file comments, protests, or interventions.

5. DEP has no objection to this request for extension of time.

THEREFORE, the Public Staff moves:

That the Commission grant the Public Staff an extension of time until the close of business on December 2, 2015, in which to file its comments in this docket.

Respectfully submitted this the 30th day of October, 2015.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Antoinette R. Wike  
Chief Counsel

Electronically submitted  
/s/ David T. Drooz  
Staff Attorney

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CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing MOTION on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 30th day of October, 2015.

Electronically submitted  
/s/ David T. Drooz