

McGuireWoods LLP
501 Fayetteville St.
Suite 500
Raleigh, NC 27601
Phone: 919.755.6600
Fax: 919.755.6699
www.mcguirewoods.com

E. Brett Breitschwerdt
Direct: 919.755.6563

McGUIREWOODS

bbreitschwerdt@mcguirewoods.com

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JUL 08 2020

July 8, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: Motion for Extension of Time to File Reply Comments on Queue Reform Proposal
Docket No. E-100, Sub 101*

Dear Ms. Campbell:

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 Reply Comments on Queue Reform Proposal.

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:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition for Approval of Revisions to Generator Interconnection Standards) MOTION FOR EXTENSION OF TIME
) TO FILE REPLY COMMENTS ON
) QUEUE REFORM PROPOSAL
)

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke” or “Movants”), and pursuant to Commission Rule R1-7, move the North Carolina Utilities Commission (“Commission” or “NCUC”) for an extension of time through and including August 15, 2020, to file reply comments in the above-captioned docket regarding Duke’s recently-filed Queue Reform Proposal.

In support of this Motion, the Movants show the Commission the following:

1. On August 27, 2019, the Commission issued its *Order Requiring Queue Reform Proposal and Comments* (“*Queue Reform Order*”), directing Duke to “file a queue reform proposal consistent with the Commission’s June 14, 2019 Order” addressing the Companies’ proposed revisions to the North Carolina Interconnection Procedures, forms, and agreements (collectively, the “NC Procedures”) needed to implement queue reform. The *Queue Reform Order* also established a comment period on Duke’s required Queue Reform Proposal.

2. Following an extensive stakeholder process requiring several extensions of time to enable further stakeholder discussions, the Commission issued its *Order Granting Further Extensions of Time* on April 27, 2020, directing Duke to file its Queue Reform Proposal and a redline version of the NC Procedures on or before May 15, 2020. The

Commission’s Order also extended the deadline for comments on Duke’s Queue Reform Proposal to June 15, 2020, and the deadline for reply comments to July 15, 2020.

3. On May 15, 2020, Duke filed its Queue Reform Proposal in accordance with the Commission’s *Order Granting Further Extensions of Time*.

4. On June 15, 2020, the North Carolina Clean Energy Business Alliance (“NCCEBA”) together with the North Carolina Sustainable Energy Association (“NCSEA”), GreenGo Energy US, Inc. (“GreenGo”), and the North Carolina Utilities Commission—Public Staff (“Public Staff”) filed comments on Duke’s Queue Reform Proposal.

5. Upon review of the initial comments filed with the Commission, NCCEBA/NCSEA have presented certain complex new issues in their comments that warranted further discussions between Duke and these important stakeholders representing many solar developer participants in the recent stakeholder process. Due to other matters, including other pending proceedings before the Commission, Duke and NCCEBA/NCSEA have had only limited opportunities to discuss these proposals since initial comments were filed, and, therefore, Duke requests an extension of time to further discuss these complex issues and determine whether additional consensus can be reached amongst these parties prior to Duke filing reply comments with the Commission.¹

¹ Duke is also cognizant that its Queue Reform Proposal respectfully requested a Commission decision by a date certain of September 15, 2020, in order to inform Duke’s plans to pursue queue reform in its other regulatory jurisdictions. The Companies recognize the practical impact of this requested extension, as well as the many obligations on the Commission’s time, and plan to modify that request as part of Duke’s Reply Comments.

6. Based on the foregoing, the Movants request an extension of time up to and including August 15, 2020, for parties to file reply comments on Duke's Queue Reform Proposal.

7. Counsel for NCCEBA and NCSEA have authorized counsel for Duke to represent that these parties support the Motion. The Movants have also discussed the Motion with counsel for the Public Staff, Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC"), and GreenGo. No parties object to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant this Motion for an extension of time through and including August 15, 2020, for parties to file reply comments in this proceeding regarding Duke's May 15, 2020 Queue Reform Proposal.

Respectfully submitted, this the 8th day of July, 2020.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt
Kristin M. Athens
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6563 (EBB)
Telephone: (919) 835-5909 (KMA)
bbreitschwerdt@mcguirewoods.com
kathens@mcguirewoods.com

Jack E. Jirak, Associate General Counsel
Duke Energy Corporation
PO Box 1551 / NCRH20
Raleigh, North Carolina 27602
Telephone: (919) 546-3257
Jack.Jirak@duke-energy.com

*Attorneys for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time to File Reply Comments on Queue Reform Proposal, 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 8th day of July, 2020.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt

McGuireWoods LLP

501 Fayetteville Street, Suite 500

PO Box 27507 (27611)

Raleigh, North Carolina 27601

Telephone: (919) 755-6563

bbreitschwerdt@mcguirewoods.com

*Attorney for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*