

SOUTHERN ENVIRONMENTAL LAW CENTER

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July 12, 2019

Via Electronic Filing

Ms. Martha Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

RE: In the Matter of: Application for Approval of Proposed Electric
Transportation Pilot
Docket Nos. E-2, Sub 1197 and E-7, Sub 1195

Dear Ms. Jarvis:

Enclosed for filing in the referenced docket is the *Motion for Extension of Time to File Reply Comments* on behalf of the North Carolina Justice Center and the Southern Alliance for Clean Energy.

By copy of this letter, I am serving all parties of record on the service list. Please let me know if you have any questions about this filing.

This the 12th day of July, 2019.

s/Nicholas Jimenez
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NJ/lgf
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application of Duke Energy)	MOTION FOR EXTENSION OF
Carolinas, LLC and Duke)	TIME TO FILE REPLY
Energy Progress, LLC for)	COMMENTS
Approval of Proposed Electric)	
Transportation Pilot)	

Pursuant to Rule R1-7 of the North Carolina Utility Commission's Rules of Practice and Procedure, the North Carolina Justice Center ("NCJC") and the Southern Alliance for Clean Energy ("SACE") move the North Carolina Utilities Commission (the "Commission") for an extension of time of three weeks through and including August 9 for all parties to file reply comments in the above captioned docket as provided for in the Commission's April 4, 2019 *Order Requesting Comments on Proposed Electric Transportation Pilot Program* and April 18 *Order Granting Extension of Time to File Comments and Reply Comments*. In support of this Motion, NCJC and SACE respectfully show the Commission that:

1. On March 29, 2019, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively "Duke Energy" or "Companies") submitted an application for approval of a proposed electric transportation pilot program ("ET Pilot").
2. On April 4, the Commission issued its *Order Requesting Comments on Proposed Electric Transportation Pilot Program*, which permitted persons with an interest in this matter to file petitions to intervene on or before May 6; intervenors and

Public Staff to file initial comments by May 6; and all parties to file reply comments by May 20.

3. On April 17, Public Staff moved to extend time to file comments and reply comments by 60 days, citing the size of the ET Pilot and its sub-programs, the complexity of the various issues Public Staff wished to investigate, and Public Staff's desire to conduct further discovery.

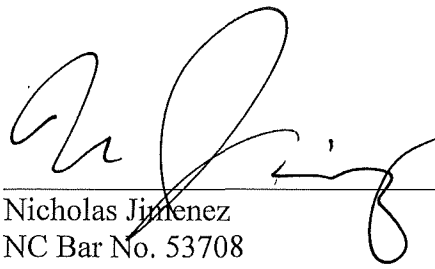
4. On April 18, the Commission granted Public Staff's motion in its *Order Granting Extension of Time to File Comments and Reply Comments*, extending the deadline to file initial comments to July 5 and the deadline for reply comments to July 19.

5. Counsel for NCJC and SACE have begun to review the numerous and extensive initial comments filed by intervenors and Public Staff on July 5, and believe that a short extension of time would assist all parties to complete their review of initial comments and address the many issues raised in them.

6. Counsel for NCJC and SACE have emailed all counsel to inquire whether any party objects to the proposed extension. Duke Energy supports the proposed extension. Public Staff, North Carolina Clean Energy Business Alliance, North Carolina Sustainable Energy Association, Greenlots, ChargePoint, and Sierra Club do not object to the extension. No party replied with an objection to the proposed extension.

WHEREFORE, the NCJC and SACE request that this Motion be granted and that the deadline to file reply comments be extended by three weeks through and including August 9 for all parties.

Respectfully submitted this the 12th day of July, 2019.



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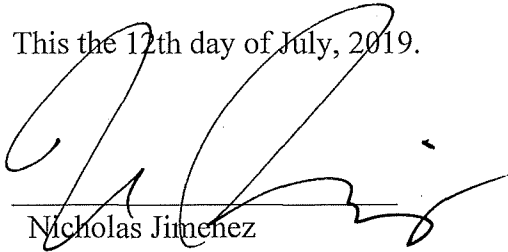
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*Attorneys for North Carolina Justice Center and
Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I certify that the persons on the service list have been served with the foregoing
Motion for Extension of Time to File Reply Comments on behalf of NCJC and SACE,
either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 12th day of July, 2019.



Nicholas Jimenez