

McGuireWoods LLP
434 Fayetteville Street
Suite 2600
PO Box 27507 (27611)
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

OFFICIAL COPY

Oct 24 2019

October 24, 2019

VIA Electronic Filing

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

**RE: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's
Motion for Extension of Time
Docket Nos. E-2, Sub 1159 and E-7, Sub 1156**

Dear Ms. Campbell:

Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, respectfully submit this Motion for Extension of Time for filing in the above-referenced proceeding.

Please feel free to contact me with any questions. Thank you for your assistance in this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:mtb

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1159
DOCKET NO. E-7, SUB 1156

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Petition for Approval of Competitive Procurement of Renewable Energy Program to Implement N.C. Gen. Stat. § 62-110.8))))))	MOTION FOR EXTENSION OF TIME OF DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC
---	----------------------------	---

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “the Companies” or “Movants”), pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission (“Commission” or “NCUC”) for a two (2) business day extension of time through and including October 29, 2019, for all parties to this proceeding to file reply comments in response to the Commission’s *Order Requesting Comments* filed on October 7, 2019. In support of this Motion, the Movants show the Commission as follows:

1. On July 2, 2019, the Commission issued its *Order Modifying and Accepting CPRE Program Plan*, modifying the Companies’ CPRE Program Plan to reflect the adjusted timeline for implementation of the Tranche 2 CPRE RFP Solicitation.

2. On October 7, 2019, the Commission issued its *Notice of Decision* in the Commission’s 2018 biennial avoided cost proceeding, Docket No. E-100, Sub 158, announcing the Commission’s decisions related to the methodology and calculation of DEC’s and DEP’s avoided cost rates under North Carolina’s implementation of the Public Utility Regulatory Policies Act of 1978 (“PURPA”). The *Notice of Decision* also announced that the Commission had not yet decided issues related to the Companies’

proposed solar Integration Services Charge (“SISC”), and that the Commission was inclined to seek additional input from interested parties regarding the SISC’s applicability to the CPRE Program.

3. Contemporaneous with issuing the *Notice of Decision*, the Commission issued an *Order Requesting Comments* in this proceeding to facilitate a decision on whether and, if so, how, the SISC should be applied in the CPRE Program. The *Order Requesting Comments* stated that any party may file comments responsive to the Order on or before October 18, 2019, and may file reply comments on or before October 25, 2019.

4. On October 18, 2019, the Companies, along with the Public Staff, First Solar, Inc., and, together, the North Carolina Sustainable Energy Association (“NCSEA”) and the North Carolina Clean Energy Business Association (“NCCEBA”) filed initial comments regarding the application of the SISC to the CPRE Program.

5. The Companies have been working diligently to meet the October 25, 2019 deadline for filing reply comments on the applicability of the SISC to the CPRE Program, but given the significant time Duke Energy personnel have committed to other matters before the Commission, Movants require additional time to finalize their reply comments.

6. Based on the foregoing, the Movants request an extension of time up to and including October 29, 2019, for all parties to file reply comments.

7. The undersigned counsel has contacted counsel for parties of record that filed initial comments via telephone and/or electronic mail. Counsel for the Public Staff, NCSEA, NCCEBA and First Solar, Inc. have stated that they have no objection to the requested extension.

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 October 29, 2019, for all parties to file reply comments on the applicability of the solar Integration Services Charge to the CPRE Program and grant such further relief as the Commission deems just and proper.

Respectfully submitted, this the 24th day of October, 2019.

/s/ E. Brett Breitschwerdt

Jack E. Jirak
Associate General Counsel
Duke Energy Corporation
PO Box 1551/NCRH 20
Raleigh, North Carolina 27602
Telephone: (919) 546-3257
Jack.jirak@duke-energy.com

E. Brett Breitschwerdt
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6563
bbreitschwerdt@mcguirewoods.com

*Counsel 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*, filed in Docket No. E-2, Sub 1159 and E-7, Sub 1156, was served electronically or via U.S. mail, first-class postage prepaid, upon all parties of record.

This the 24th day of October, 2019.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
PO Box 27507 (27611)
Raleigh, North Carolina 27601
(919) 755-6563 (EBB phone)
bbreitschwerdt@mcguirewoods.com

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

OFFICIAL COPY

Oct 24 2019