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Sep 13 2021

September 13, 2020

VIA ELECTRONIC FILING

Ms. Antonia Dunston, Interim Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: Motion for Extension of Time
Docket No. E-100, Sub 101
Docket No. E-100, Sub 158

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceedings on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC is their *Motion for Extension of Time* to file a compliance filing pursuant to Ordering Paragraph 6 of the Commission's August 17, 2021 *Order Approving SISC Avoidance Requirements and Addressing Solar-Plus-Storage Qualifying Facility Installations*.

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:sjg

Enclosure

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 101
DOCKET NO. E-100, SUB 158

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 101)	
)	
In the Matter of)	
Petition for Approval of Revisions to)	
Generator Interconnection Standards)	
)	DUKE ENERGY CAROLINAS,
DOCKET NO. E-100, SUB 158)	LLC AND DUKE ENERGY
)	PROGRESS, LLC’S
In the Matter of)	MOTION FOR EXTENSION OF
Biennial Determination of Avoided Cost)	TIME
Rates for Electric Utility Purchases from)	
Qualifying Facilities – 2018)	

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, “Duke”), pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and move the Commission for a fourteen-day extension of time through and including September 29, 2021, for Duke to file a compliance filing pursuant to Ordering Paragraph 6 of the Commission’s August 17, 2021 *Order Approving SISC Avoidance Requirements and Addressing Solar-Plus-Storage Qualifying Facility Installations*.

In support of the foregoing, Duke shows the Commission the following:

1. On August 17, 2021, the Commission issued an *Order Approving SISC Avoidance Requirements and Addressing Solar-Plus-Storage Qualifying Facility Installations* (the “Order”) in the above-referenced dockets, requiring the Duke to file, on

or before September 15, 2021, in both Docket Nos. E-100, Sub 101 and E-100, Sub 158: 1) a comprehensive waiver request reflecting all waivers that are needed from the North Carolina Interconnection Procedures, in order to comply with the Commission’s directive to move ahead with an enrollment window for the Energy Storage System Retrofit Study Process; and 2) the procedure for how a qualifying facility establishes eligibility for the avoided cost rate or methodology applicable to the output of an energy storage addition (“compliance filing”).

2. DEC and DEP are continuing to evaluate the directives in the Order and are working diligently to prepare the compliance filing; however, due to the legal and technical nature of the issues raised in the Order and significant competing obligations on business personal needed to develop the compliance filing, additional time is required. The Companies are also evaluating certain legal issues and require additional time to determine whether to seek clarification or reconsideration of the Order.

3. Based on the foregoing, Duke requests an extension of fourteen days, up to and including September 29, 2021, to file the waiver request and proposed procedures in these proceedings.

4. Counsel for Duke has contacted counsel for all parties of record regarding this Motion. No party has advised that it objects to the Motion, and Dominion Energy North Carolina, North Carolina Sustainable Energy Association, Carolinas Clean Energy Business Alliance, Southern Alliance for Clean Energy and Public Staff have each authorized the Companies to state that they do not 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 September 29, 2021 for Duke to file the compliance filing in these proceedings, and grant such other relief as the Commission deems just and proper.

Respectfully submitted, this the 13th day of September, 2021.

/s/ Brett Breitschwerdt

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Extension of Time*, as filed in Docket Nos. E-100, Sub 101, and E-100, Sub 158 was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 13th day of September, 2021.

/s/E. Brett Breitschwerdt

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