

LAW OFFICE OF CHARLOTTE MITCHELL

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May 21, 2015

Gail Mount  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603 – 5918

**Re: Motion for Extension of Time  
NCUC Docket No. E-100 Sub 140**

Dear Ms. Mount:

Enclosed for filing in the above-referenced docket is a MOTION FOR EXTENSION OF TIME.

Should you have any questions or comments, please do not hesitate to call me. Thank you in advance for your assistance and cooperation.

Regards,

/s Charlotte Mitchell

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 140

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Biennial Determination of Avoided Cost	)	<b>MOTION FOR EXTENSION OF TIME</b>
Rates for Electric Utility Purchases from	)	
Qualifying Facilities - 2014	)	

NOW COMES the North Carolina Sustainable Energy Association (“NCSEA”), by and through undersigned counsel, and respectfully moves the North Carolina Utilities Commission (the “Commission”) for an extension of time for filing initial comments, reply comments, and proposed orders on the avoided costs filings made by Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, Inc. (“DEP”), and Dominion North Carolina Power (“DNCP”), (collectively, the “Utilities”).

In support of this motion, NCSEA shows the following:

1. By order issued in the above-referenced docket on January 8, 2015, the Commission directed the Utilities to file their proposed avoided cost rates and standard form contracts no later than March 2, 2015, in accordance with the determinations and guidance set forth in the Commission’s December 31, 2014 Order in the same docket. In addition, the Commission established a procedural schedule for other parties to file initial comments no later than Monday, May 4, 2015; reply comments no later than Monday, June 8, 2015; and proposed orders no later than Monday, July 6, 2015.

2. In response to a motion of the Public Staff, the Commission issued an order in the above-referenced docket on April 15, 2015: 1) extending the filing deadline for

initial comments to June 8, 2015; 2) extending the filing deadline for reply comments to July 13, 2015; and 3) extending the filing deadline for proposed orders to August 10, 2015.

3. NCSEA began its analysis promptly following the March 2 filings of the Utilities and served initial discovery on the Utilities within two weeks of receiving the filings. NCSEA has received responses to initial rounds of discovery requests; however, NCSEA currently has discovery requests pending with each of the Utilities.

4. In order to ensure sufficient time for NCSEA's expert witness to analyze all responses to discovery requests, including those responses which have not yet been received, and for NCSEA's counsel to incorporate this analysis into comments, NCSEA respectfully requests that the Commission extend the current deadlines as follows: for initial comments from June 8, 2015 to June 22; for reply comments from July 13, 2015 to July 27, 2015; and for proposed orders from August 10, 2015 to August 24, 2015. NCSEA understands the press of business has necessitated longer periods for responding to discovery by the Utilities and seeks only to preserve its ability to present thorough and well-considered comments.

5. NCSEA does not seek a similar extension for the discovery period. Therefore, should the Commission be willing to grant the extensions requested herein, the discovery period will not continue beyond June 8, 2015.

6. Neither the Public Staff nor the Utilities objects to this request.

This the 21<sup>st</sup> day of May, 2015.

LAW OFFICE OF CHARLOTTE MITCHELL, PLLC

/s Charlotte A. Mitchell  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that she has served a copy of the foregoing **MOTION FOR EXTENSION OF TIME** upon the parties of record in this proceeding, or their attorneys, by electronic mail.

This 21<sup>st</sup> day of May, 2015.

/s Charlotte A. Mitchell

4830-1567-3124, v. 1