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December 29, 2016

J. L. Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603 – 5918

**Re: Objection to Motion for Extension of Time To File Answer
 NCUC Docket No. EC-23, Sub 50**

Dear Ms. Jarvis:

Enclosed herewith, please find the Objection to Motion for Extension of Time To File Answer for filing on behalf of Blue Ridge Electric Membership Corporation in the above-referenced docket. 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. EC-23, SUB 50

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Blue Ridge Electric
Membership Corporation,
Petitioner

against

Charter Communications
Properties LLC,
Respondent.

OBJECTION TO MOTION
FOR EXTENSION OF TIME
TO FILE ANSWER

NOW COMES Blue Ridge Electric Membership Corporation (“BREMC”), by and through undersigned counsel, and submits this Objection to Motion for Extension of Time to File Answer (the “Objection”) to the North Carolina Utilities Commission (the “Commission”) in response to the Motion for Extension of Time to File Answer filed in the above-captioned docket by Charter Communications Properties, LLC (“Charter”). In support of this Objection, BREMC respectfully shows the Commission the following:

1. On November 30, 2016, BREMC filed a Verified Complaint and Petition for Relief (“Complaint”) against Charter in the above-captioned docket.
2. On December 6, 2016, the Commission issued an order directing Charter to satisfy the demands of BREMC or to file an answer to the Complaint on or before Wednesday, January 11, 2017.
3. On December 22, 2016, Charter filed a Motion for Extension of Time to File Answer, requesting that the Commission issue an order granting Charter an additional

twenty (20) days, to and including January 31, 2017, to file an answer to BREMC's Complaint.

4. In its motion, Charter explained that on December 15, 2016 Charter asked BREMC to agree to a thirty (30) day extension for the deadline for filing a responsive pleading, but BREMC agreed to extend the deadline by only seven (7) days, citing a desire to resolve the dispute expeditiously.

5. BREMC objects to Charter's request for an additional twenty (20) days to file its answer for the following reasons. Rule R1-9 of the Rules and Regulations of the North Carolina Utilities Commission establishes a standard response time of ten (10) days after the date on which a respondent is served with a complaint, which may be extended or shortened in the Commission's discretion. In giving Charter until January 11, 2017 to respond to BREMC's Complaint, the Commission already provided Charter with additional time beyond ten (10) days to respond. As has always been the case, BREMC is willing to engage in negotiations in effort to refine the issues in dispute and perhaps resolve any such issue without resort to guidance from the Commission. However, BREMC's objective is to reach an agreement expeditiously and cost effectively and takes the position that allowing Charter the full extent of the additional time requested is counter to this objective.

WHEREFORE, BREMC respectfully requests that the Commission enter an order denying Charter's request for an extension of time, or, in the event the Commission is inclined to provide Charter with additional time, enter an order granting a limited extension of time of seven (7) days until January 18, 2017 to file its answer.

Respectfully submitted this the 29th day of December, 2016.

/s Charlotte A. Mitchell
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ATTORNEY FOR BLUE RIDGE ELECTRIC
MEMBERSHIP CORPORATION

CERTIFICATE OF SERVICE

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

Charter Communications Properties LLC

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This 29th day of December, 2016.

/s Charlotte A. Mitchell