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April 19, 2021

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

> RE: Joint Petition for Approval of Model Small Generation Interconnection Standards & Associated Application to Interconnect & Interconnection Contract Forms NCUC Docket No. E-100, Sub 101

Dear Ms. Campbell:

On behalf of Strata Solar, LLC and Strata Solar Development, LLC and the Carolinas Clean Energy Business Association, we submit the attached Joint Motion for Further Extension of Time to File Reply Comments in the above-referenced docket.

Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

Karen M. Kemerait

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cc: All parties of record Enclosure

A Pennsylvania Limited Liability Partnership

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of: Joint Petition for Approval of Model Small Generation Interconnection Standards & Associated Application to Interconnect &

Interconnection Contract Forms

JOINT MOTION FOR FURTHER EXTENSION OF TIME TO FILE REPLY COMMENTS

NOW COMES Strata Solar, LLC and Strata Solar Development, LLC (collectively, "Strata") and the Carolinas Clean Energy Business Association ("CCEBA"), by and through counsel and pursuant to Rules R1-7 and R1-9 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), and moves the Commission for an additional extension of time for thirty (30) days to file reply comments.

In support of this Motion, Strata and CCEBA show the Commission the following:

1. On March 9, 2021, the Commission issued its *Order Seeking Comments*Regarding Generator Inspection Provisions of the North Carolina Generator

Interconnection Standards ("Order Seeking Comments"). In the Commission's Order

Seeking Comments, the Commission requested comments from the parties as to their

concerns regarding the inspection of Uninspected Facilities.

- 2. By Order dated March 16, 2021, the Commission extended the times for all parties to file comments until March 29, 2021 and reply comments until April 12, 2021.
- 3. On March 29, 2021, Duke Energy Progress, LLC ("DEP") and Duke Energy Carolinas, LLC ("DEC") (collectively, "Duke") filed comments, Strata and CCEBA filed joint comments, and the Public Staff filed a letter in lieu of comments.
- 4. On April 7, 2021, Strata and CCEBA requested an extension of time for fourteen (14) days for the parties to file reply comments so that they could have discussions with Duke and the Public Staff about issues related to the inspection of Uninspected Facilities. On April 12, 2021, the Commission granted the extension of time for parties to file reply comments.
- 5. Strata and CCEBA request a further extension of time for thirty (30) days for the parties to file reply comments. The parties are engaging in further discussions about resolution of the issues related to the inspection of Uninspected Facilities.

 Therefore, Strata and CCEBA need additional time so that they may attempt to reach resolution of the issues before filing reply comments
- 6. Duke and the Public Staff have indicated that they support Strata's and CCEBA's request for a further extension of time for thirty (30) days for parties to file reply comments.

WHEREFORE, Strata and CCEBA respectfully request that the Commission grant a further thirty (30)-day extension of time so that the parties may file reply comments on or before May 26th, 2021.

Respectfully submitted this 19th day of April, 2021.

Karen M. Kamerait

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/s/ John D. Burns

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Attorney for CCEBA

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing MOTION FOR FURTHER EXTENSION OF TIME TO FILE REPLY COMMENTS has been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

This 19th day of April, 2021.

/s/ Karen M. Kemerait_

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