DOCKET NO. E-100, SUB 128 DOCKET NO. E-100, SUB 131

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 128

FILED APR 03 2012

In the Matter of Investigation of Integrated Resource Planning in North Carolina – 2010

DOCKET NO. E-100, SUB 131

In the Matter of 2011 REPS Compliance Plans and 2010 Compliance Reports Clerk's Office MOTION FOR EXTENSION OF TIME

OFFICIAL COP

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Robert P. Gruber, and moves for an extension of time until Friday, April 27, 2012, for all parties to file comments on the 2010 Renewable Energy and Energy Efficiency Portfolio Standard (REPS) Compliance Reports filed by EnergyUnited, the Public Works Commission of Fayetteville (Fayetteville), the City of Fountain, GreenCo Solutions, Inc., Halifax Electric Membership Corporation, North Carolina Eastern Municipal Power Agency, North Carolina Municipal Power Agency No. 1, the Town of Oak City, the Tennessee Valley Authority, and the Town of Winterville. In support of this motion the Public Staff respectfully shows unto the Commission:

1. In its order of February 9, 2012, in this docket, the Commission requested the Public Staff to review the 2010 REPS compliance reports of the entities listed above and file comments by April 5, 2012.

2. Although the Public Staff has worked diligently to prepare its comments by the April 5 deadline, certain issues have arisen at a very late stage concerning Fayetteville's compliance report. The Public Staff has sent a data request to Fayetteville concerning these issues, and Fayetteville has not yet responded. As a result the Public Staff will not be able to complete its comments by April 5.

3. In order to deal with these late-arising issues, the Public Staff is in need of an extension of time until Friday, April 27. This extension will not result in prejudice to any party.

WHEREFORE, the Public Staff prays:

1. For an order extending the deadline for the Public Staff and other parties to file comments on the 2010 REPS compliance reports of the above listed entities until Friday, April 27, 2012; and

2 For such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 3rd day of April, 2012.

PUBLIC STAFF Robert P. Gruber Executive Director

Antoinette R. Wike Chief Counsel

Robert S. Gillam

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CERTIFICATE OF SERVICE

I certify that a copy of this Motion for Extension of Time has been served on all parties of record or their attorneys, or both, by depositing a copy in the United States Mail, first class postage prepaid, properly addressed.

This the 3rd day of April, 2012.

Robert S. Gillam

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