

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. G-9, SUB 728  
DOCKET NO. SP-13243, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 728	)	
	)	
In the Matter of	)	
Application of GESS International North	)	
Carolina, Inc., for Approval to Participate in	)	
Alternative Gas Pilot Program and for Approval	)	MOTION FOR
of Receipt Agreements	)	EXTENSIONS
	)	OF TIME
	)	
DOCKET NO. SP-13243, SUB 0	)	
	)	
In the Matter of	)	
Application of GESS International North	)	
Carolina, Inc., for Declaratory Rulings	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves the Commission for extensions of time for the filing of comments and reply comments in the above-referenced dockets. In support of this motion, the Public Staff respectfully shows the following:

1. On February 15, 2021, GESS International North Carolina, Inc. (GESS NC), and GESS RNG Biogas USA, LLC (GESS RNG) (collectively GESS), filed a Motion to Amend Order Approving Participation in Pilot Program with Conditions in Docket No. G-9, Sub 728 (Second Amended Pilot Application).

2. On February 16, 2021, GESS RNG filed a Second Supplemental and Amended Request for Declaratory Ruling (Second Amended Declaratory Application) in Docket Nos. G-9, Sub 728 and SP-13243, Sub 0.

3. On April 9, 2021, the Commission issued its Order Requesting Additional Information and Comments, ordering that (a) on or before June 11, 2021, the Public Staff and Piedmont Natural Gas Company, Inc. (Piedmont), and other parties desiring to do so, shall file comments on GESS's Second Amended Pilot Application and Second Amended Declaratory Application; and (b) on or before June 28, 2021, GESS, the Public Staff and Piedmont, and other parties desiring to do so, shall file reply comments. A copy of the order was served by electronic service on counsel for Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (collectively, the Duke Utilities).

4. Due to the press of business and a medical emergency requiring the absence of counsel, the Public Staff will be unable to file comments on June 11, 2021. As such, the Public Staff respectfully requests that the Commission extend the current deadline for the comments of all parties from June 11, 2021, to June 25, 2021, and the deadline for the reply comments of all parties from June 28, 2021, to July 12, 2021.

5. The Public Staff contacted counsel for GESS, Piedmont, and the Duke Utilities. No party indicated that they objected to the proposed extensions.

WHEREFORE, for the reasons set forth, the Public Staff respectfully requests that the Commission extend the time for filing the comments of all parties to June 25, 2021, and for the filing of the reply comments of all parties to July 12, 2021.

Respectfully submitted, this the 10th day of June, 2021.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Dianna W. Downey  
Chief Counsel

Electronically submitted  
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#### CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing Motion upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 10th day of June, 2021.

Electronically submitted  
/s/ Elizabeth D. Culpepper  
Elizabeth D. Culpepper