

February 21, 2023

VIA Electronic Filing

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: Duke Energy Carolinas, LLC's and Duke Energy Progress LLC's Motion
for Extension of Time
Docket No. E-100, Sub 101 and E-100, Sub 158*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC is its Motion for Extension of Time.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB/tll

Enclosure

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 101
DOCKET NO. E-100, SUB 158

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Petition for Approval of Revisions to)	DUKE ENERGY CAROLINAS,
Generator Interconnection Standards)	LLC’S AND DUKE ENERGY
)	PROGRESS LLC’S MOTION FOR
)	EXTENSION OF TIME

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”, and together with DEC, “Duke Energy” or the “Companies”), by and through counsel and pursuant to Rule R1-7, and move the North Carolina Utilities Commission (“Commission”) to extend the deadline to report on any energy storage system retrofit (“ESS Retrofit”) projects that have submitted notice of commitment forms (“NOC Form”) as required by Ordering Paragraph No. 4 of the Commission’s May 12, 2022 *Order Granting Waivers to Implement Energy Storage System Expedited Study Process to Establish Eligibility of Avoided Cost Rates for Retrofit Energy Storage Systems* (“May 12 Order” or the “Order”). Specifically, the Companies request that the Commission extend the March 1, 2023 reporting deadline to July 31, 2023, which is 32 calendar days beyond the closing of the 2023 definitive interconnection system impact study (“DISIS”) request window on June 29, 2023.

In support of this Motion, the Companies show the Commission the following:

1. The Commission’s *May 12 Order* directed that “by March 1, 2023, Duke shall file a report on the total number of ESS Retrofit NOC forms that have been submitted and the status of those projects.” The Commission further directed that “[w]ithin 60 days

of that report, any party may file a request to the Commission to consider whether the ESS Retrofit process should be expanded to include QFs with a LEO established after November 15, 2016, and whether standard rates for ESS Retrofits should be available for ESS Retrofits that submit NOC forms after November 1, 2023.”

2. As of the filing of this Motion, Duke Energy has not received any NOC Forms for ESS Retrofit projects. The Companies therefore anticipate that they will not have data to report to the Commission on March 1, 2023, regarding ESS Retrofit NOC forms and the status of any such ESS Retrofit projects.

3. As the Commission is aware, the 2023 DISIS request window is set to close on June 29, 2023,¹ and the Companies will be in a position to provide a current report on any ESS Retrofit projects that may submit NOC Forms in the intervening months at that time.

4. In addition, the Companies require additional time to address the considerations identified in the second part of Ordering Paragraph No. 4—whether eligibility for the ESS Retrofit process and ESS Retrofit standard rates should be expanded—their position on which must be finalized within sixty (60) days of filing the report. Accordingly, the Companies respectfully request that the Commission extend the March 1, 2023 filing deadline until after the 2023 DISIS request window closes on June 29, 2023.

5. The Companies have discussed these issues with the Public Staff and have contacted counsel for parties of record regarding this Motion. The Public Staff has

¹ See NCIP § 4.4.1.

indicated its support for the Motion. Although not all counsel have responded, no party has indicated any objection to the Companies' Motion.

WHEREFORE, the Companies respectfully request that the Commission grant this Motion and issue an order extending the deadline to file the required report on the total number of ESS Retrofit NOC Forms submitted to the Companies and their corresponding status from March 1, 2023 to July 31, 2023.

Respectfully submitted, this the 21st day of February 2023.

/s/ E. Brett Breitschwerdt
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*Attorneys for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Extension of Time, as filed in Docket Nos. E-100, Sub 101 and E-100, Sub 158, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 21st day of February, 2023.

/s/E. Brett Breitschwerdt

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