

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 141

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
2015 Biennial Integrated Resource)	MOTION TO AUTHORIZE
Plan Updates and Related 2015)	COMBINED COMMENTS ON
REPS Compliance Plans)	REPS COMPLIANCE PLANS

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves for an order that (1) authorizes the Public Staff to file combined comments on the 2015 Renewable Energy and Energy Efficiency Portfolio Standard (REPS) compliance plans of the State's three electric utilities, and (2) designates Thursday, October 22, 2015, as the deadline for filing the combined comments. In support of this motion the Public Staff respectfully shows unto the Commission:

1. Under Commission Rules R8-60(h)(2) and (4), the State's electric utilities must file integrated resource plan update reports in each odd-numbered year. Each update report must include the utility's REPS compliance plan for the year of filing and the two following years. Under Rule R8-60(l), the Public Staff must report within 60 days "whether [the] utility's update report meets the requirements of this rule," and it must also file comments on the of the utility's REPS compliance plan during that same time period.

2. Virginia Electric and Power Company d/b/a Dominion North Carolina Power (DNCP) filed its 2015 update report on July 1, 2015, and the update reports of Duke Energy Carolinas, LLC (DEC) and Duke Energy Progress, LLC (DEP)

were filed on September 1, 2015. Accordingly, the Public Staff's comments on the DEC and DEP reports are currently due on November 2, 2015. The comments on DNCP's report were originally due on August 31, 2015; however, in an order issued on August 27, 2015, the Commission granted the Public Staff an extension of time until September 21, 2015.

3. The Public Staff expects that on or before the existing deadline dates, it will be able to file its comments on whether DNCP's update report meets the requirements of Rule R8-60.

4. The Public Staff also expects to be able to complete its review of DNCP's compliance plan by September 21. However, the Public Staff believes it will be helpful to the Commission to receive comments on each utility's REPS compliance plan in a single combined filing, as it has in previous years; and the Public Staff will not be able to complete its review of DEC and DEP's REPS compliance plans by September 21.

5. The Public Staff does expect to complete its review of DEC and DEP's REPS compliance plans, and prepare its comments on all three utilities' plans, by October 22, 2015. Therefore, the Public Staff proposes to file combined comments on the REPS compliance plans for DEC, DEP, and DNCP on October 22, 2015.

6. The Public Staff has contacted DNCP, DEC and DEP, and none of them have objected to the filing procedure and deadline proposed herein.

WHEREFORE, the Public Staff prays:

1. That the Commission authorize the Public Staff to file combined comments on the REPS compliance plans of DEC, DEP, and DNCP;
2. That the Commission designate Thursday, October 22, 2015, as the deadline for filing the combined comments; and
3. For such other and further relief as the Commission may deem just and proper.

This the 17th day of September, 2015.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Antoinette R. Wike
Chief Counsel

Electronically submitted
s/ Robert S. Gillam
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
bob.gillam@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that a copy of this Motion to Authorize Combined Comments on REPS Compliance Plans has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 17th day of September, 2015.

Electronically submitted
s/ Robert S. Gillam