

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 158**

In the Matter of:)	
Biennial Determination of Avoided Cost)	JOINT MOTION OF THE
Rates for Electric Utility Purchases from)	NORTH CAROLINA
Qualifying Facilities – 2018)	SUSTAINABLE ENERGY
)	ASSOCIATION AND THE
)	NORTH CAROLINA CLEAN
)	ENERGY BUSINESS
)	ALLIANCE FOR AN
)	EXTENSION OF TIME TO
)	FILE NOTICE OF APPEAL
)	AND EXCEPTIONS

**JOINT MOTION OF THE NORTH CAROLINA SUSTAINABLE ENERGY
ASSOCIATION AND THE NORTH CAROLINA CLEAN ENERGY BUSINESS
ALLIANCE FOR AN EXTENSION OF TIME TO FILE NOTICE OF APPEAL AND
EXCEPTIONS**

The North Carolina Sustainable Energy Association (“NCSEA”) and the North Carolina Clean Energy Business Alliance (“NCCEBA”) (NCSEA and NCCEBA, collectively, “Movants”), through the undersigned, jointly move for an extension of time in which to file a notice of appeal and exceptions to the Order Establishing Standard Rates and Contract Terms for Qualifying Facilities issued by the North Carolina Utilities Commission (“Commission”) on April 15, 2020 (“Order”). In support of this Motion, Movants show as follows:

1. Pursuant to N.C.G.S. § 62-90(a), the Movants may file notice of appeal and exceptions to the Order within 30 days of its issuance, “or within such time thereafter as may be fixed by the Commission, not to exceed 30 additional days.”
2. The current deadline for noticing appeal of the Order is May 15, 2020. The Movants seek an additional thirty (30) days extension of time to consider whether to appeal the Order.
3. The Movants request this extension of time because the Order, spanning over 137 pages, is lengthy and includes a host of issues highlighted by 53 distinct findings of fact which are

still are under review by the Movants and their respective members to determine whether they should be considered for an appeal. Movants have diligently worked through the Order but anticipate needing additional time to adequately assess whether to file a Notice of Appeal and Exceptions.

4. Additionally, the Covid-19 Pandemic has complicated and made irregular the Movants' normal methods to review the substantive issues contained within the Order with the Movants' respective organizational staff and members.

5. The undersigned communicated the Movants' intent to file this Joint Motion to the parties in this docket and asked if any party objects. Counsel for Duke Energy Progress, LLC, Duke Energy Carolinas, LLC, Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina, Cube Yadkin, LLC, NC WARN, the Small Hydro Group, Southern Alliance for Clean Energy, and the North Carolina - Public Staff have each responded indicating their respective clients have no objection. No other party to this docket has responded.

Wherefore, NCSEA and NCCEBA respectfully request an extension of an additional 30 days, up to and including June 15, 2020, in which any party may file a notice of appeal and exceptions to the Commission's April 15, 2020 Order.

Respectfully submitted this the 8th day of May, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 8th day of May, 2020.

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