

**OFFICIAL COPY**

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**FILED**

**NOV 25 2009**

Clerk's Office  
N.C. Utilities Commission

November 25, 2009

Ms. Renné C. Vance, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4325

RE: Docket No. E-100, Subs 118 and 124

Dear Ms. Vance:

Enclosed for filing are the original and thirty (30) copies of Duke Energy Carolinas, LLC's Motion for Extension of Time to file Direct Testimony and Updated Integrated Resource Plan in the above referenced dockets.

Sincerely,



Robert W. Kaylor

Enclosures

cc: Parties of Record

*(S)*  
Full Dist.

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 118

DOCKET NO. E-100, SUB 124

**FILED**

**NOV 25 2009**

Clerk's Office  
N.C. Utilities Commission

DOCKET NO. E-100, SUB 118

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In the Matter of

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Investigation of Integrated Resource

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Planning in North Carolina – 2008

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**MOTION FOR EXTENSION OF TIME TO**

**FILE DIRECT TESTIMONY AND**

DOCKET NO. E-100, SUB 124

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**UPDATED INTEGRATED RESOURCE**

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**PLAN**

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In the Matter of

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Investigation of Integrated Resource

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Planning in North Carolina – 2009

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Duke Energy Carolinas, LLC (“Duke Energy Carolinas” or “Company”) hereby moves the North Carolina Utilities Commission (“Commission”), for an order granting it an extension of time from December 11, 2009 to January 11, 2010 to file its direct testimony pursuant to the Commission’s *Order Scheduling Hearings on 2009 Integrated Resource Plans and REPS Compliance Plans and Consolidating Dockets for Decision* in this docket (October 19, 2009) (“the Order”) in support of the 2008 and 2009 IRPs and its 2009 Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) Compliance Plan. The Company additionally requests that the extension also apply to the deadline to file its revisions to the Company’s 2009 Integrated Resource Plan (“IRP”) pursuant to the requirements of the Commission’s *Order on Advance Notice*, Docket No. E-7, Sub 923 (November 10, 2009). In support of this motion, the Company respectfully shows the Commission the following:

1. The Commission’s Order requires Duke Energy Carolinas, Carolina Power & Light d/b/a Progress Energy Carolinas, Inc. (“Progress Energy”) and Virginia Electric and Power Company d/b/a Dominion North Carolina Power (“Dominion”) to file direct

testimony and exhibits by no later than December 11, 2009. In addition to its direct testimony and exhibits, pursuant to the Commission's *Order on Advance Notice* in Docket No. E-7, Sub 923, Duke Energy Carolinas is also required to present revisions to its IRP as necessary to include information (1) to move the load from the power purchase agreement with Central Electric Power Cooperative, Inc. ("Central") out of the undesignated wholesale load amount; (2) to explain the discrepancy between the 130 MW amount stated in the advance notice in Docket No. E-7, Sub 923 and the 150 MW amount shown on the Company's October 21 filing in that docket; (3) to provide the amount of load and projected load for each present wholesale customer, including Central, on a year-by-year basis through the terms of the current contracts, and explain any growth rate projections that differ from the Company's projections for its own retail load; and (4), to the extent any undesignated wholesale load is included in the IRP, to justify the amount shown, on a year-by-year basis, with information, filed confidentially if appropriate, as to potential customers' current supply arrangements and the Company's reasonable expectations for serving such customers.

2. The Company intends on filing the direct testimony of four (4) witnesses in support of its IRP and REPS Compliance Plans; Robert Mc Murry, Director of Integrated Resource Planning – Carolinas for Duke Energy Corporation, Richard Stevie, Ph.D., Managing Director of Customer Market Analytics for Duke Energy Corporation, James Riddle, Manager of Load Forecasting for Duke Energy Corporation, and Owen Smith, Managing Director of Regulated Renewable Energy and Carbon Strategy for Duke Energy Corporation. Dr. Stevie is currently offering testimony and supporting exhibits on behalf of the Company in the pending rate proceeding before the Public

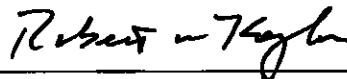
Service Commission of South Carolinas, PSCSC Docket No. 2009-226-E. The evidentiary hearing in that matter is scheduled to begin on November 30, 2009. Mr. Smith is also offering testimony on behalf of the Company in the pending Joint Motion to Modify the Swine and Poultry Waste Set-Asides in Docket No. 100, Sub 113, which is set for an evidentiary hearing on December 8, 2009. As these hearings occur shortly before the December 11 deadline, Dr. Stevie and Mr. Smith will have little time to complete their respective direct testimony before that deadline. Further, counsel involved in this proceeding is also involved in the South Carolina rate proceeding and the Joint Motion proceeding.

3. Additionally, in the *Order on Advance Notice*, the Commission ordered Duke Energy Carolinas to file the additional information described above “in order to assist the Commission in considering the appropriate treatment of existing and potential future wholesale loads in the IRP process . . .” To comply with the requirements of the *Order on Advance Notice*, the Company must develop certain revised portfolio information to the 2009 IRP, so as to include the additional information to satisfy the Commission’s requests. Specifically, to address item (4) in Paragraph 1 above, Duke Energy Carolinas must develop additional portfolios, analyze these new portfolios within the resource planning models, and compare the results of that analysis to the September 1, 2009 IRP filing (with the appropriate level of executive review). Mr. Mc Murry will lead this portfolio development and analysis, and his testimony, and the IRP revisions required by the *Order on Advance Notice*, will not be complete or current until this additional work is finished. Duke Energy Carolinas anticipates that this additional analysis will take several weeks to complete.

4. Duke Energy Carolinas submits that an additional thirty (30) days is necessary for it to complete and file the necessary direct testimony and revisions to its IRP in accordance with the requirements of the Commission's *Order on Advance Notice*. Given the extended period between the current filing deadline for direct testimony and the deadline for intervenor testimony, the Company does not seek to modify or extend any of the other deadlines for the submission of intervenor or rebuttal testimony as set forth in the Order.
5. Duke Energy Carolinas has consulted with the Public Staff and other parties to this proceeding, and no party has objected to the proposed extension.

WHEREFORE, for the reasons set forth above, Duke Energy Carolinas, LLC, respectfully requests a time extension from December 11, 2009 to January 11, 2009 to file its direct testimony and revised IRP.

Respectfully submitted this 25<sup>th</sup> day of September, 2009.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of Duke Energy Carolinas, LLC's Motion for Extension of Time in Docket Nos. E-100, Sub 118 and E-100, Sub 124 has been served by electronic mail (e-mail), hand delivery or by depositing a copy in United States Mail, first class postage prepaid, properly addressed to the parties of record.

This the 25<sup>th</sup> day of November, 2009.

  
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