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September 1, 2020

Ms. Kimberley A. Campbell, Chief Clerk North Carolina Utilities Commission **Dobbs Building** 430 North Salisbury Street Raleigh, North Carolina 27603

> Re: Docket Nos. E-22, Sub 562 and E-22, Sub 566

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceedings on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC" or the "Company"), is its Motion for Extension of Time.

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

Very truly yours,

/s/Mary Lynne Grigg

MLG:kjg

Enclosure

## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

**DOCKET NO. E-22, SUB 562 DOCKET NO. E-22, SUB 566** 

#### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application of Dominion Energy North Carolina for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina	) ) MOTION FOR EXTENSION
In the Matter of Petition of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina, for an Accounting Order to Defer Certain Capital and Operating Costs Associated with Greensville County Combined Cycle Addition	OF TIME TO SERVE THE PROPOSED RECORD

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC" or the "Company"), through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission ("Commission"), hereby moves the Commission for an extension of time in which to serve Appellants' proposed record on appeal on other parties in accordance with Rules 18(d)(2) and (f) and 27(c) of the North Carolina Rules of Appellate Procedure in the above-captioned matter. In support thereof, the Company states the following:

1. On July 29, 2020, DENC filed a timely notice of appeal and exceptions to the Commission's February 24, 2020 *Order Accepting Public Staff Stipulation in Part, Accepting CIGFUR Stipulation, Deciding Contested Issues, and Granting Partial Rate Increase* in this proceeding pursuant to N.C.G.S. § 62-90(a).

- 2. On August 17, 2020, the North Carolina Attorney General's Office ("AGO") filed a motion for Extension of Time to File Cross Appeal. The Commission granted this motion on August 17, 2020.
- 3. The current deadline for serving the proposed record on appeal is September 2, 2020. The deadline may be extended by the Commission for up to thirty days pursuant to Rules 18(f) and 27(c) (1) of the North Carolina Rules of Appellate Procedure. Due to other workload of the attorneys involved in the case, the pending cross appeal from the AGO, the complexity of the issues, the many parties, and the large record, additional time is required to prepare and serve the proposed record, and DENC requests an additional 30 days to and including Thursday, October 1, 2020, to serve the proposed record.
- 4. The undersigned have communicated with counsel for the AGO, the Public Staff, Carolina Industrial Group for Fair Utility Rates I, and Nucor, who stated that they do not object to the requested extension.

WHEREFORE, Dominion Energy North Carolina respectfully requests that the Commission grant its motion for extension of an additional 30 days, up to an including Thursday, October 1, 2020, in which to serve the proposed record on appeal on other parties in this proceeding.

# Respectfully submitted, this the 1st day of September, 2020.

### DOMINION ENERGY NORTH CAROLINA

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Counsel for Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing <u>Motion for Extension of Time</u>, as filed in Docket Nos. E-22, Sub 562 and E-22, Sub 566, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 1<sup>st</sup> day of September, 2020.

/s/Mary Lynne Grigg

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