

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 167**

In the Matter of:)	NCSEA, SACE, AND
Biennial Determination of)	NCCEBA’S JOINT MOTION
Avoided Cost)	FOR EXTENSION OF TIME
Rates for Electric Utility)	
Purchases from)	
Qualifying Facilities – 2020)	

**NCSEA, SACE, AND NCCEBA’S JOINT MOTION FOR EXTENSION OF
TIME**

NOW COME the North Carolina Sustainable Energy Association (“NCSEA”), Southern Alliance for Clean Energy (“SACE”), and the North Carolina Clean Energy Business Alliance (“NCCEBA”) (NCSEA, SACE, and NCCEBA, collectively, “Joint Commenters”), pursuant to Commission Rule R1-7, and move the North Carolina Utilities Commission (“Commission”) for a seven-day extension of time through and including Friday, March 5, 2021, for parties to file reply comments in this docket. The deadline for reply comments was established in the Commission’s August 13, 2020 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* (“Order Establishing Proceeding”) and previously modified by the Commission’s December 30, 2020 *Order Granting Extension of Time* in the above-captioned docket. In support of the Motion, the Joint Commenters show the Commission as follows:

1. In the Order Establishing Proceeding, the Commission directed for reply comments be filed by parties on or before February 12, 2021.
2. In its October 30, 2020 *Order Granting Continuance and Establishing Reporting Requirements*, the Commission stated: “considering the expedited nature of this proceeding the parties to the docket are encouraged to strictly adhere to the schedule set forth in the Scheduling Order.”

3. Thus far, there has been only one extension of time requested and granted in this proceeding, which extended the time for parties to file reply comments until February 26, 2021.

4. On February 12, 2021, Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (DEC and DEP, collectively, “Duke”) filed the *Supplemental Filing of Revised Energy Rate Calculations and Updated Avoided Energy Rates* (“Supplemental Rate Calculations”) in response to the initial comments made by the North Carolina – Public Staff (“Public Staff”) and the Joint Commenters.

5. The 62-page Supplemental Rate Calculation filing included five exhibits and provided updated avoided energy rates across both Duke utilities.

6. The Joint Commenters are working diligently on reply comments, but the press of other business and the filing of the Supplemental Rate Calculations have combined to result in a need for additional time for the Joint Commenters to analyze the new rate calculations and finalize their reply comments.

7. The Joint Commenters do not intend to prolong or belabor this expedited avoided cost proceeding and do not anticipate the need for further request extension of time.

8. For the foregoing reasons, the Joint Comments request a seven-day extension of time for parties to file reply comments. The undersigned counsel have contacted counsel for all parties of record regarding this motion and none object to this motion.

WHEREFORE, the Joint Commenters respectfully request that the Commission extend the deadline for the submission of reply comments for the 2020 Avoided Cost

Proceeding as requested above; and for such further relief as the Commission may deem just and proper.

Respectfully submitted this the 22nd day of February 2021.

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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 Petition to Intervene 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 22nd day of February 2021.

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