

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 101**

In the Matter of:)	
Petition for Approval of Generator)	NCSEA’S MOTION FOR
Interconnection Standard)	POSTPONEMENT OF
)	EVIDENTIARY HEARING
)	

NCSEA’S MOTION FOR POSTPONEMENT OF EVIDENTIARY HEARING

NOW COMES the North Carolina Sustainable Energy Association (“NCSEA”) pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission (“Commission”) for to postpone the evidentiary hearing in the above-captioned proceeding presently scheduled to begin on Monday, January 28, 2019. In support of this motion, NCSEA shows the Commission as follows:

1. The Commission’s October 5, 2018 *Order Approving Interim Modifications to North Carolina Interconnection Procedures for Tranche 1 of CPRE RFP* scheduled an evidentiary hearing in the above-captioned proceeding to begin on January 28, 2019.
2. The Commission’s October 5, 2018 order further encouraged parties “to conduct settlement negotiations in order to reduce the number of issues in dispute.”
3. Subsequent to the Commission’s October 5, 2018 order, NCSEA received no communications from Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Virginia Electric Power Company d/b/a Dominion Energy North Carolina, the North Carolina Pork Council, or the Public Staff – North Carolina Utilities Commission (collectively, “Settling Parties”) regarding settlement negotiations to reduce the number of issues in dispute.

4. On Friday, January 25, 2019 at approximately 4:34 P.M., NCSEA was served with the *Agreement and Stipulation of Partial Settlement by and between Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Dominion Energy North Carolina, North Carolina Pork Council, and the Public Staff – North Carolina Utilities Commission* (“*Agreement and Stipulation of Partial Settlement*”).

5. Service of the *Agreement and Stipulation of Partial Settlement* occurred less than one business day prior to when the evidentiary hearing in the above-captioned proceeding is scheduled to begin.

6. Prior to service of the *Agreement and Stipulation of Partial Settlement*, NCSEA was not aware that the Settling Parties were engaged in negotiations. Upon information and belief, other intervenors to the above-captioned proceeding also had no knowledge that the Settling Parties were engaged in negotiations.

7. The *Agreement and Stipulation of Partial Settlement* includes as Exhibit 1 a redline of the North Carolina Interconnection Procedures that is 135 pages long and necessitates close examination by parties to this proceeding.

8. In its *Order Declining to Adopt Proposed Settlement Rules* in Docket No. M-100, Sub 145, the Commission wrote that it “agrees that it is preferable when manageable for all parties to have an opportunity to participate in the settlement negotiations.” However, NCSEA was not afforded the opportunity to participate in the settlement negotiations that led to the *Agreement and Stipulation of Partial Settlement*.

WHEREFORE, NCSEA respectfully requests that the Commission grant this Motion for a postponement of the evidentiary hearing in the above-captioned proceeding presently scheduled to begin on Monday, January 28, 2019 for a period of one week to

allow NCSEA and other parties to evaluate the *Agreement and Stipulation of Partial Settlement*, and grant such further relief as the Commission deems just and proper.

Respectfully submitted, this the 26th day of January, 2019.

/s/ Peter H. Ledford
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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 Comments 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 26th day of January, 2019.

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