## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. EMP-116, SUB 0

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Juno Solar, LLC, for a ) MOTION OF THE
Certificate of Public Convenience and ) PUBLIC STAFF FOR
Necessity to Construct a 275-MW Solar ) EXTENSION OF TIME
Facility in Richmond County, North )
Carolina )

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the North Carolina Utilities Commission (Commission) to extend the deadline for the Public Staff's filing of testimony and exhibits in Docket No. EMP-116, Sub 0, and to likewise extend the deadline for the Applicant's filing of rebuttal testimony and exhibits. In support of this motion, the Public Staff respectfully shows the Commission the following:

- 1. On July 12, 2021, Juno Solar, LLC (Applicant) filed an application pursuant to N.C. Gen. Stat. § 62-110.1 and Commission Rule R8-63 for a certificate of public convenience and necessity to construct a 275-MW<sub>AC</sub> solar photovoltaic electric generating facility to be located in Richmond County, North Carolina.
- On August 31, 2021, the Commission issued an Order Scheduling Hearings, Filing of Testimony, Establishing Procedural Guidelines, and Requiring Public Notice (Procedural Order).

- 3. On September 14, 2021, the Applicant filed the supplemental direct testimony of Piper Miller addressing questions from the Commission in the Procedural Order.
- 4. Because of the press of other ongoing dockets and deadlines, the Public Staff requires additional time to conduct a thorough investigation of the Applicant's application and testimony, and to draft its direct testimony. A two-week extension would provide the Public Staff with sufficient time to review the information in this docket and provide recommendations to the Commission.
- 5. The Public Staff therefore requests that the Commission extend the deadline for the Public Staff's filing of testimony and exhibits by two weeks, to October 26, 2021. The Public Staff further requests that the Commission extend the deadline for the Applicant's filing of rebuttal testimony and exhibits by a commensurate two weeks, to November 9, 2021.
- 7. The Public Staff has contacted counsel for the Applicant and is authorized to represent that the Applicant does not object to this motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for the Public Staff's filing of testimony and exhibits to October 26, 2021, and extending the deadline for the Applicant's filing of rebuttal testimony and exhibits to November 9, 2021.

This the 7th day of October, 2021.

PUBLIC STAFF Christopher J. Ayers Executive Director

Dianna W. Downey Chief Counsel

Electronically submitted /s/ Layla Cummings Staff Attorney

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## **CERTIFICATE OF SERVICE**

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 7th day of October, 2021.

Electronically submitted /s/ Layla Cummings