

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-7, SUB 1213
DOCKET NO. E-7, SUB 1214
DOCKET NO. E-7, SUB 1187
DOCKET NO. E-2, SUB 1193
DOCKET NO. E-2, SUB 1219

DOCKET NO. E-7, SUB 1213)
)
In the Matter of)
Application for Approval of Proposed)
Prepaid Advantage Program)

DOCKET NO. E-7, SUB 1214)
)
In the Matter of)
Application of Duke Energy Carolinas, LLC)
for Adjustment of Rates and Charges)
Applicable to Electric Utility Service in North)
Carolina)

DOCKET NO. E-7, SUB 1187)
)
In the Matter of)
Application of Duke Energy Carolinas, LLC)
for an Accounting Order to Defer)
Incremental Storm Damage Expenses)
Incurred as a Result of Hurricanes Florence)
and Michael and Winter Storm Diego)

**PUBLIC STAFF'S MOTION FOR
EXTENSION OF TIME TO FILE
LATE-FILED EXHIBITS**

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission
by and through its Executive Director, Christopher J. Ayers, and respectfully
requests that the Commission extend the time to file late-filed exhibits in this
proceeding to November 16, 2020. In support of this Motion, the Public Staff states
as follows:

1. On September 3, 2020, during the expert witness hearing held by the Commission in Docket Nos. E-7, Subs 1213, 1214 and 1187 involving the general rate case application of Duke Energy Carolinas, LLC (DEC or Company), Commissioners Kimberly W. Duffley and Daniel G. Clodfelter requested late filed exhibits reflecting the impact on revenue requirement using the federal unprotected Excess Deferred Income Taxes (EDIT) to offset certain costs. Commissioner Duffley requested schedules showing the impact on DEC's and the Public Staff's proposed revenue requirement amounts that reflect an offset of federal unprotected EDIT and the Company's coal combustion residual (CCR) remediation costs. Commissioner Clodfelter requested that DEC and the Public Staff provide a schedule reflecting the revenue requirement impact if EDIT were used to offset the Company's calculation of accelerated depreciation associated with the early retirement of coal-fired electric generating plants, based on the Company's requested amount.

2. On September 29, 2020, during the expert witness hearing being held by the Commission in Docket Nos. E-2, Sub 1193 and E-2, Sub 1219 involving the general rate case application of Duke Energy Progress, LLC (DEP or Company), Commissioner Duffley and Presiding Commissioner Clodfelter made the same requests of DEP as were made of DEC concerning certain offsets.

3. On September 9, 2020, DEC and the Public Staff (Movants), filed a joint letter in Docket Nos. E-7, Sub 1213, E-7, Sub 1214, E-7, Sub 1187, E-2, Sub 1193, and E-2, Sub 1219 stating that they wanted to ensure that they provide exhibits that accurately reflect the information requested by the Commission.

Movants attached to their letter questions intended to clarify the assumptions that DEC and the Public Staff should use in their respective analyses.

4. On October 2, 2020, the Commission issued an *Order Responding to Letter Requesting Clarification*, wherein the Commission provided answers to the Movants' questions and required DEC, DEP, and the Public Staff to file their late-filed exhibits and schedules in response to the Commission's Order on or before Friday, October 9, 2020.

5. The Public Staff, DEC, and DEP have been working diligently on their late-filed exhibits and the Public Staff requires input from one of its consultants. In order to produce the most accurate exhibit in accordance with the Commission's stated assumptions, the Movants will need an additional week. DEC and DEP have authorized me to represent that they consent to this extension motion.

WHEREFORE, the Public Staff respectfully requests:

1. That the Commission extend the time to file late-filed exhibits, described herein, to November 16, 2020; and
2. Such other and further relief as the Commission may find just and proper.

Respectfully submitted, this the 8th day of October, 2020.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Gina C. Holt
Staff Counsel

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
Email: gina.holt@psncuc.nc.gov

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 8th day of October, 2020.

Electronically submitted
/s/ Gina C. Holt