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> Andrea R. Kells Direct: 919.755.6614

> > January 14, 2016

VIA ELECTRONIC FILING

Mrs. Gail L. Mount, Chief Clerk North Carolina Utilities Commission Dobbs Building 430 North Salisbury Street Raleigh, North Carolina 27603

Re: Docket No. E-100, Sub 140

Dear Mrs. Mount:

On behalf of Virginia Electric and Power Company, d/b/a Dominion North Carolina Power, Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, enclosed for filing in the above-referenced docket is a *Motion for Extension of Time*.

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

Very truly yours,

s/Andrea R. Kells

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Enclosures

Jan 14 2016

STATE OF NORTH CAROLINA **UTILITIES COMMISSION** RALEIGH

DOCKET NO. E-100, SUB 140

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of **Biennial Determination of Avoided Cost** Rates for Electric Utility Purchases from **Qualifying Facilities** – 2014

MOTION FOR EXTENSION **OF TIME**

NOW COME Virginia Electric and Power Company, d/b/a Dominion North Carolina Power ("DNCP"), Duke Energy Carolinas, LLC ("DEC"), and Duke Energy Progress, LLC ("DEP") (together, the "Utilities"), by and through their respective counsel and, pursuant to North Carolina Utilities Commission ("Commission") Rule Rl-7, respectfully request that the Commission issue an order extending the deadline for the submission of compliance filings in this proceeding, as set out herein.

In support of this motion, the Utilities show as follows:

1. On December 17, 2015, the Commission issued an Order Establishing Standard Rates and Contract Terms for Qualifying Facilities in the above-captioned proceeding ("Phase 2 Order"). The Phase 2 Order directed the Utilities to file new versions of their respective avoided cost rate schedules and standard contracts, in compliance with the order, within 30 days of the date of issuance of the order. See Phase 2 Order at OP 27. Pursuant to that directive, the Utilities' compliance filings are currently due to be filed with the Commission by Tuesday, January 19, 2016.

2. The Utilities have each been working diligently to meet the January 19, 2016 deadline. However, due to the complexity involved with determining how to most appropriately comply with all of the directives contained in the Phase 2 Order, the Utilities need additional time in which to complete their compliance filings. Therefore, the Utilities respectfully request an extension of an additional two weeks, until Tuesday, February 2, 2016, in order to submit the compliance filings.

3. The Utilities have conferred with counsel for the Public Staff and the North Carolina Sustainable Energy Association regarding this motion, and neither of those parties objects to this request. The Utilities have also informed counsel for the Southern Alliance for Clean Energy of their intent to file this motion, and are not aware of any objection to this motion from that organization.

WHEREFORE, the Utilities respectfully request that the Commission enter an order extending the time for the Utilities to submit filings in compliance with the Phase 2 Order until February 2, 2016, as set forth herein.

Jan 14 2016

Respectfully submitted,

By: <u>/s/Andrea R. Kells</u> Andrea R. Kells McGuireWoods LLP 434 Fayetteville St. Suite 2600 Raleigh, NC 27601 Phone: (919) 755-6614 Fax: (919) 755-6699 akells@mcguirewoods.com

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Attorney for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC

Dated: January 14, 2016

Jan 14 2016

CERTIFICATE OF SERVICE

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

This the 14th day of January, 2016.

/s/Andrea R. Kells

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Attorney for Dominion North Carolina Power