

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. EMP-117, SUB 0

In the Matter of the Application of)	
Shawboro East Ridge Solar, LLC, for)	APPLICANT'S MOTION FOR
a Certificate of Public Convenience)	EXTENSIONS OF TIME
and Necessity for Merchant Plant)	
Pursuant to N.C. Gen. Stat. 62-110.1)	
And Commission Rule R8-63)	

NOW COMES Applicant Shawboro East Ridge Solar, LLC, by and through its undersigned counsel, and respectfully moves the North Carolina Utilities Commission (the "Commission") to extend Applicant's time to file its responses to Public Staff Data Request No. 1, and to also extend correspondingly the deadlines for subsequent testimony in the above-referenced docket. In support of this motion, Applicant respectfully shows the Commission the following:

1. On August 12, 2021, the Commission issued an Order Scheduling Hearings, Filing of Testimony, Establishing Procedural Guidelines, and Requiring Further Notice.
2. The Public Staff submitted its Data Request No. 1 on September 2, 2021. Applicant's responses were requested to be served by September 13, 2021.
3. Due to the unavailability of certain key personnel, Applicant needs an additional two weeks in which to complete its responses, or until September 27, 2021.

4. Applicant's counsel has contacted the Public Staff and is authorized to represent that the Public Staff does not object to the requested extension, so long as corresponding extensions of the current dates for testimony are also granted.

5. A corresponding extension of two subsequent deadlines is also requested as a result of Applicant's extension of time to respond to the data requests of the Public Staff. Specifically, it is further requested that the deadline for the direct testimony of the Public Staff and other intervenors be extended to October 5, 2021, and that the Applicant's deadline for rebuttal testimony be extended to October 21, 2021.

WHEREFORE, Applicant respectfully requests that the Commission issue an order extending Applicant's time in which to file its responses to Public Staff's Data Request No. 1 to September 27, 2021; that the deadline for the direct testimony of the Public Staff and other intervenors be extended to October 5, 2021; and, that Applicant's deadline for rebuttal testimony be extended to October 21, 2021.

Respectfully submitted this 13th day of September, 2021.



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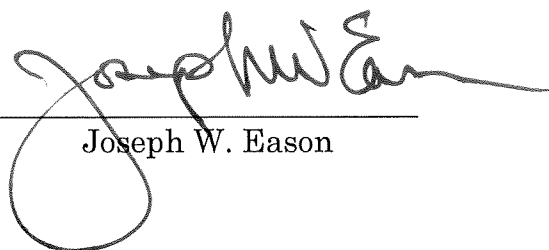
CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion for Extension of Time was served upon the following by electronic mail:

Christopher Ayers, Esq.
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This the 13th day of September, 2021.



Joseph W. Eason