Jack E. Jirak Deputy General Counsel

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September 17, 2021

VIA Electronic Filing

Ms. Antonia Dunston, Interim Chief Clerk North Carolina Utilities Commission Dobbs Building 430 North Salisbury Street Raleigh, North Carolina 27603

> Re: Joint Motion of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Public Staff—North Carolina Utilities Commission for Extension of Time to File Materials for Technical Conference Docket Nos. E-100, Sub 165

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding is the <u>Joint Motion of</u> <u>Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Public Staff—North</u> <u>Carolina Utilities Commission for Extension of Time to File Materials for Technical</u> <u>Conference</u>.

Please feel free to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/Jack E. Jirak

Enclosure

Sep 17 2021

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 165

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

2020 Biennial Integrated Resource Plans and Related 2020 REPS Compliance Plans JOINT MOTION OF DUKE ENERGY CAROLINAS, LLC, DUKE ENERGY PROGRESS, LLC, AND PUBLIC STAFF-NORTH CAROLINA UTILITIES COMMISSION FOR EXTENSION OF TIME TO FILE MATERIALS FOR TECHNICAL CONFERENCE

NOW COME Duke Energy Carolinas, LLC ("DEC), Duke Energy Progress, LLC ("DEP") (collectively, the "Companies"), and the Public Staff-North Carolina Utilities Commission ("Public Staff" and together with the Companies, the "Joint Movants") pursuant to Commission Rule R1-7 and respectfully request that the North Carolina Utilities Commission ("Commission") extend the time for all parties to file presentations to be used at the September 30 and October 1, 2021 technical conference by two (2) business days to Monday, September 27, 2021. In support of this motion, the Companies show the Commission as follows:

1. On August 24, 2021, the Commission entered an Order in this docket scheduling a technical conference to be held on September 30 and October 1, 2021, beginning at 9:30 a.m. (the "Technical Conference"). According to the Order, the purpose of the technical conference is for the Commission to "hear additional oral presentation" and to provide the Commissioners an opportunity to ask questions on three topics: (1) the methodology for evaluating economic retirement of coal-fired generating units; (2) "all-

source" procurement processes; and (3) grid impacts of different portfolios. The Order further instructed that the Companies and intervenors will be allowed up to one hour to present on each topic, while the Public Staff and Attorney General will each be allowed a half hour to present on each topic.

2. On September 16, 2021, the Commission entered a second Order advising that the Technical Conference shall be conducted remotely via Webex and instructing parties to file in this docket all presentation materials which will be used by presenters at the Technical Conference on or before September 23, 2021.

3. The Companies and the Public Staff have each been working diligently to prepare fulsome presentations addressing each of the three topics the Commission identified for discussion at the Technical Conference. The Joint Movants have each been working with the understanding, based on the Commission's August 24, 2021 Order, that presentation materials should be ready to share with the Commission by the beginning of the Technical Conference on September 30.

4. In light of the Commission's September 16, 2021 Order, the Joint Movants are working to expedite preparation of their presentations so that these materials can be filed with the Commission for its review in advance of the Technical Conference. Nevertheless, due to the schedules of subject matter experts involved in developing the presentation and to ensure their written materials reflect a thorough discussion of the three Commission-identified topics, the Joint Movants each require additional time to finalize their presentations in advance of the Technical Conference.

5. The undersigned counsel has contacted counsel for all parties of record regarding this motion via electronic mail. Counsel for the Carolina Industrial Group for

Fair Utility Rates, ElectriCities of North Carolina, Inc., Southern Alliance for Clean Energy, Inc., Natural Resources Defense Council, Sierra Club, Carolinas Clean Energy Business Association, North Carolina Sustainable Energy Association, Carolina Utility Customers Association, Inc., NC WARN, and the Attorney General's Office confirmed they have no objection to the Companies' motion, and no counsel for any party has raised an objection.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and the Public Staff respectfully request that the Commission grant their joint motion for a two (2) business day extension of time, through and including September 27, 2021, for all parties to file their presentation materials to be used at the September 30 and October 1, 2021 Technical Conference, and grant such further relief as the Commission deems just and proper.

This the 17th day of September, 2021.

<u>/s/Lucy E. Edmondson</u> Lucy E. Edmondson Staff Attorney Public Staff – North Carolina Utilities Commission 4326 Mail Service Center Raleigh NC 27699-4300 (919) 733-6110 lucy.edmondson@psncuc.nc.gov

Counsel for Public Staff-North Carolina Utilities Commission

/s/Jack E. Jirak

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Sep 17 2021

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

Sep 17 2021

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing <u>Joint Motion of Duke Energy</u> <u>Carolinas, LLC, Duke Energy Progress, LLC, and Public Staff—North Carolina Utilities</u> <u>Commission for Extension of Time to File Materials for Technical Conference</u>, as filed in

Docket No. E-100, Sub 165, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 17th day of September, 2021.

/s/E. Brett Breitschwerdt E. Brett Breitschwerdt McGuireWoods LLP 501 Fayetteville Street, Suite 500 PO Box 27507 (27611) Raleigh, North Carolina 27601 Telephone: (919) 755-6563 bbreitschwerdt@mcguirewoods.com

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