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Aug 06 2020

August 6, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: North Carolina Interconnection Procedures
Docket No. E-100, Sub 101*

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, the North Carolina Clean Energy Business Alliance and the North Carolina Sustainable Energy Association is a *Joint Motion for Additional Extension of Time to File Reply Comments on Queue Reform Proposal*.

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

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:sjg

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Extension of Time to File Reply Comments on Queue Reform Proposal, as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 6th day of August, 2020.

/s/E. Brett Breitschwerdt

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*Attorney for Duke Energy Carolinas, LLC
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**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition for Approval of Revisions to Generator Interconnection Standards) JOINT MOTION FOR ADDITIONAL
) EXTENSION OF TIME TO FILE REPLY
) COMMENTS ON QUEUE REFORM
) PROPOSAL

NOW COME Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke”), the North Carolina Clean Energy Business Alliance (“NCCEBA”), and the North Carolina Sustainable Energy Association (“NCSEA”) (together, “Movants”) pursuant to Commission Rule R1-7, and move the North Carolina Utilities Commission (“Commission” or “NCUC”) for an extension of time through and including August 31, 2020, to file reply comments in the above-captioned docket regarding Duke’s recently-filed Queue Reform Proposal.

In support of this Motion, the Movants show the Commission the following:

1. On August 27, 2019, the Commission issued its *Order Requiring Queue Reform Proposal and Comments* (“*Queue Reform Order*”), directing Duke to “file a queue reform proposal consistent with the Commission’s June 14, 2019 Order” addressing the Companies’ proposed revisions to the North Carolina Interconnection Procedures, forms, and agreements (collectively, the “NC Procedures”) needed to implement queue reform. The *Queue Reform Order* also established a comment period on Duke’s required Queue Reform Proposal.

2. Following an extensive stakeholder process requiring several extensions of time to enable further stakeholder discussions, the Commission issued its *Order Granting*

Further Extensions of Time on April 27, 2020, directing Duke to file its Queue Reform Proposal and a redline version of the NC Procedures on or before May 15, 2020. The Commission's Order also extended the deadline for comments on Duke's Queue Reform Proposal to June 15, 2020, and the deadline for reply comments to July 15, 2020.

3. On May 15, 2020, Duke filed its Queue Reform Proposal in accordance with the Commission's *Order Granting Further Extensions of Time*.

4. On June 15, 2020, NCCEBA together with NCSEA, GreenGo Energy US, Inc. ("GreenGo"), and the North Carolina Utilities Commission—Public Staff ("Public Staff") filed comments on Duke's Queue Reform Proposal.

5. On July 8, 2020, Duke filed a Motion for Extension of Time to File Reply Comments on Queue Reform Proposal requesting the Commission provide an extension of time for all parties to file reply comments on Duke's Proposal. On July 13, 2020, the Commission granted Duke's Motion, extending the date for Duke and other interested parties to file Reply Comments to August 15, 2020.

6. Since Duke's July 8, 2020 Motion, Movants have made significant progress in reaching consensus to limit the number of contested issues before the Commission. However, due to the complexity and importance of issues being negotiated, as well as other matters, including other pending proceedings before the Commission, Movants need additional time to attempt to reach full consensus prior to filing Reply Comments. Movants submit that resolving the issues raised by NCCEBA/NCSEA's comments and achieving full consensus amongst the Movants will be vastly superior to a partial consensus approach, will promote judicial economy, and increase the possibility of a more efficient and expedient decision by the Commission. As previously identified in the Queue Reform

Proposal, a timely Commission decision is of great importance as it will allow Duke to more quickly commence the required follow-on approval process before the South Carolina Public Service Commission and the Federal Energy Regulatory Commission.

7. In addition, Movants also submit that the public interest would be served by Duke hosting another open stakeholder meeting in order to explain the limited revisions to Duke's Queue Reform Proposal to other interested parties prior to filing Reply Comments to the Commission. Duke proposes to schedule such a meeting during the week of August 17-21.

8. Movants therefore request an extension of time to attempt to resolve outstanding issues and to allow Duke to engage with other stakeholders regarding limited revisions to its Queue Reform Proposal prior to the due date for filing reply comments with the Commission.

9. Based on the foregoing, the Movants request an extension of time up to and including August 31, 2020, for parties to file reply comments on Duke's Queue Reform Proposal.

10. Counsel for the Public Staff has authorized counsel for Duke to represent that the Public Staff supports the requested extension, and specifically supports allowing time for an additional stakeholder meeting to allow feedback on the limited revisions to the Queue Reform Proposal being discussed by the Movants. Counsel for Duke has also discussed the Motion with Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC"), and GreenGo, and these parties also do not object to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, the North Carolina Clean Energy Business Alliance, and North Carolina Sustainable Energy

Association respectfully request that the Commission grant this Motion for an extension of time through and including August 31, 2020, for parties to file reply comments in this proceeding regarding Duke's Queue Reform Proposal.

Respectfully submitted, this the 6th day of August, 2020.

/s/E. Brett Breitschwerdt

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