## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-100, SUB 157

In the Matter of:	
2018 Biennial Integrated Resource Plans )	NCSEA'S MOTION FOR
and Related 2018 REPS Compliance Plans )	<b>EXTENSION OF TIME</b>

## NCSEA'S MOTION FOR EXTENSION OF TIME

NOW COMES the North Carolina Sustainable Energy Association ("NCSEA") pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission ("Commission") for an extension of time through and including Friday February 15, 2019, for parties to file initial comments on the 2018 integrated resource plans ("IRPs") filed by Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP"). In support of this motion, NCSEA shows the Commission as follows:

1. DEC and DEP filed their respective 2018 IRPs on September 5, 2018. Pursuant to Rule R8-60(k), initial comments on DEC and DEP's IRPs are due "Within 150 days after the later of either September 1 or the filing of each utility's biennial report," which is Saturday February 2, 2019. Rule R1-27 states that "when the last day of any such period falls on Saturday, Sunday, a legal holiday under the laws of this State, or a day on which the offices of the Commission for any reason are not open for business, the computation of time shall omit such day and begin on the first day thereafter which does not fall on any such day." Accordingly, initial comments on DEC and DEP's IRPs are due on Monday February 4, 2019.

IRP.

<sup>&</sup>lt;sup>1</sup> Virginia Electric and Power Company d/b/a Dominion Energy North Carolina ("Dominion") filed its IRP on May 1, 2018. NCSEA understands that the Public Staff – North Carolina Utilities Commission plans to file a separate motion regarding the procedural schedule for initial and reply comments on Dominion's IRP. As such, NCSEA is not requesting an extension of time for parties to file initial comments on Dominion's

- 2. NCSEA has worked diligently on its initial comments, but other Commission proceedings and the press of other business have resulted in a need for additional time to finalize its filing.
- 3. For the foregoing reasons, NCSEA requests an extension of time through and including Friday February 15, 2019 for parties to file their initial comments on DEC and DEP's IRPs.
- 4. The undersigned counsel has contacted counsel for all parties to the above-captioned proceeding regarding this motion and none have advised that they object to this motion. Counsel for DEC and DEP indicated that they would not object to this motion if the Commission closes the discovery period for DEC and DEP's IRPs on January 22, 2019. NCSEA has no objection to this request, and as such requests that the Commission close the discovery period for DEC and DEP's IRPs on January 22, 2019.
- 5. Pursuant to Rule R8-60(k), reply comments are due "Within 60 days after the filing of initial comments[.]" Therefore, if this Motion is granted, reply comments to the initial comments on DEC and DEP's IRPs would be due on Tuesday April 16, 2019.

WHEREFORE, NCSEA respectfully requests that the Commission grant this Motion for an extension of time through and including Friday February 15, 2019, for parties to file initial comments on DEC and DEP's IRPs and to close the discovery period for DEC and DEP's IRPs on January 22, 2019.

Respectfully submitted, this the 17th day of January, 2019.

/s/ Peter H. Ledford
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## **CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Comments by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 17th day of January, 2019.

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