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May 29, 2020

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

***RE: Petition for Approval of Revisions to Generator
Interconnection Standards
NCUC Docket No. E-100, SUB 101***

Dear Ms. Campbell:

On behalf of North Carolina Clean Energy Business Alliance, we submit the attached **Motion to for Extension of Time to File Comments** in the above-referenced docket.

Should you have any questions concerning this testimony or exhibits attached thereto, please do not hesitate to contact me.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

skb

CC: All Parties of Record
Enclosures

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

**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

MOTION FOR EXTENSION OF TIME
TO FILE COMMENTS

NOW COMES the North Carolina Clean Energy Business Alliance (“NCCEBA”), by and through counsel and pursuant to Rules R1-7 and R1-9 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and moves the Commission for a fifteen (15)-day extension of time to file comments regarding Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s (together, “Duke”) initial Implementation of IEEE 1547-2018 Guidelines and report entitled “Impact of Enabling Inverter Based Resource Reactive Power Controls” filed in this docket on April 1, 2020.

In support of this Motion, NCCEBA shows the Commission the following:

1. In the Commission’s June 14, 2019 *Order Approving Revised Interconnection Standard and Requiring Reports and Testimony* in Docket No. E-100, Sub 101 (“*NCIP Order*”), the Commission directed Duke to “conduct stakeholder meetings in 2020 to consider how to address IEEE Standard 1547-2018 in the NC Interconnection Standard, including the use of software-based controls for limiting a generator’s output, and to report to the Commission as to the status of this effort by [April] 1, 2020.” *NCIP Order*, p. 10. The *NCIP Order* further directed that the “stakeholder process should allow for all participants to contribute to the joint development of meeting agendas, including topics to be addressed, and for all participants to have a reasonable opportunity to contribute to the discussion of all issues or items on the agendas.” *NCIP Order*, p. 62.

2. The *NCIP Order* directed Duke to file a report on the stakeholder process and the study results by April 1, 2020. The *NCIP Order* also allowed parties to file comments on the report by June 1, 2020.

3. NCCEBA members participated in the stakeholder meetings about how to address IEEE Standard 1547-2018 in the NC Interconnection Standard.

4. Duke filed its report about how to address IEEE Standard 1547-2018 in the NC Interconnection Standard on April 1, 2020.

5. NCCEBA is in the process of considering the information contained in Duke's report. As such, NCCEBA requires a fifteen (15)-day extension to file responsive comments.

6. Duke, the North Carolina Sustainable Energy Association, and the Public Staff have indicated that they support NCCEBA's request for a fifteen (15)-day extension of time.

WHEREFORE, NCCEBA respectfully requests that the Commission grant a fifteen-day extension of time so that NCCEBA may file comments on or before June 16, 2020.

Respectfully submitted this the 29th of May, 2020.

FOX ROTHSCHILD LLP

/s/Karen M. Kemerait

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Attorney for NCCEBA

CERTIFICATE OF SERVICE

I hereby certify that a copy of North Carolina Clean Energy Business Alliance's **Motion for Extension of Time** in Docket No. E-100, Sub 101, has been served by electronic mail, hand delivery, or by depositing a copy in the United States mail, postage prepaid, properly addressed to all parties of record.

This the 29th day of May, 2020.

Attorney for North Carolina Clean
Energy Business Alliance

/S/ Karen Kemerait

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