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April 5, 2021

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Joint
Motion for Additional Extension of Time
Docket No. E-100, Sub 167**

Dear Ms. Campbell:

Enclosed for filing in the above-referenced docket is Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Joint Motion for Additional Extension of Time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Kendrick C. Fentress".

Kendrick C. Fentress

cc: Parties of Record

Enclosure

OFFICIAL COPY

Apr 05 2021

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 167

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	JOINT MOTION OF DUKE
Biennial Determination of Avoided Cost)	ENERGY CAROLINAS, LLC AND
Rates for Electric Utility Purchases from)	DUKE ENERGY PROGRESS, LLC
Qualifying Facilities – 2020)	FOR ADDITIONAL EXTENSION
)	OF TIME TO FILE PROPOSED
)	ORDERS
)	

NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “the Companies or “the Movants”), pursuant to Commission Rule R1-7, and move the North Carolina Utilities Commission (“Commission” or “NCUC”) for an additional two-week extension of time through and including April 23, 2021, for all parties to file proposed orders as provided for in the Commission’s August 13, 2020 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing*, its December 30, 2020 *Order Granting Extensions of Time* and its March 19, 2021 *Order Granting Further Extension of Time*. In support of this Motion, the Movants respectfully show the Commission as follows:

1. On August 13, 2020, the Commission issued its *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* (“Order Establishing Proceeding”) establishing this proceeding as the Commission’s biennial proceedings held pursuant to N.C. Gen. Stat. § 62-156(a) to implement Section 210 of the Public Utility Regulatory Policies Act of 1978. The Order Establishing Proceeding directed Movants and other utilities to file initial statements and updated avoided cost rates

and tariffs on November 2, 2020 (“Initial Filings”). This Order also provided for filing of initial comments and exhibits by the North Carolina Utilities Commission – Public Staff (“Public Staff”) and other parties in response to the Initial Filings on or before January 11, 2021, reply comments by February 12, 2021, and proposed orders related solely to proposed changes in the methodologies used to calculate the avoided costs, as well as the data inputs and assumptions used in applying those methodologies by Friday, March 12, 2021.

2. On November 2, 2020, the Companies, along with Dominion Energy North Carolina (“DENC”), each made their Initial Filings in the docket. On December 22, 2020, Western Carolina University and New River Light and Power filed their joint Initial Filing. On December 23, 2020, DENC filed a revised DENC Exhibit 16, annualized proposed rates.

3. On December 29, 2020, the Public Staff filed a motion requesting that the Commission extend by two weeks the filing deadlines for comments and proposed orders established in the Commission’s *Order Establishing Proceeding*.

4. On December 30, 2020, the Commission issued its Order extending the time for all parties, other than the electric utilities, to file their comments and exhibits: establishing January 25, 2021 as the deadline for the filing of these comments and exhibits. The Order also established February 26, 2021 as the deadline for the filing of reply comments and March 26, 2021 as the deadline for the filing of proposed orders.

5. On January 25, 2021, the Public Staff filed initial comments, and North Carolina Sustainable Energy Association (“NCSEA”), North Carolina Clean Energy

Business Alliance (“NCCEBA”) and Southern Alliance for Clean Energy (“SACE”) filed joint initial comments.

6. On February 22, 2021, NCSEA, NCCEBA and SACE filed a joint motion for a seven-day extension of time to file reply comments but did not request a commensurate extension of time to file proposed orders.

7. On February 23, 2021, the Commission issued its Order extending the time for all parties to file reply comments, establishing March 5, 2021 as the new due date.

8. On March 17, 2021, the Companies filed a motion for extension of time to file proposed orders, which the Commission granted on March 19, 2021.

9. The Companies are working diligently with the Public Staff to prepare a joint proposed order but, due to the press of other business, require additional time to allow for resolution of certain matters and more productive coordination. Based on the foregoing, the Companies respectfully request an extension of two weeks, up to and including April 23, 2021, for all parties to file proposed orders in the docket.

10. The Companies submit that no party will be prejudiced by the requested extension.

11. Counsel for the Companies has contacted counsel for all parties of record regarding this Motion via telephone and/or electronic mail. No party has advised that it objects to the Motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant this Motion for an extension of time through and including April 23, 2021 for parties to file proposed orders in this proceeding, and such other relief as the Commission deems just and proper.

Respectfully submitted, this 5th day of April, 2021.



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

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Joint Motion for Additional Extension of Time, in Docket No. E-100, Sub 167, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 5th day of April, 2021.



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