

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 147

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
2016 Biennial Integrated Resource Plan)	Motion for Extension
Updates and Related 2016 REPS)	of Time
Compliance Plans)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully requests that the Commission issue an order extending the time for Duke Energy Carolinas, LLC (DEC), Duke Energy Progress, LLC (DEP) (collectively, Duke) and the Public Staff to submit the joint report addressing the utilities' target reserve margins called for in the Commission's June 27, 2017, *Order Accepting Integrated Resource Plans and Accepting REPS Compliance Plans* (2016 IRP Order) in this Docket.

In support of this motion, the Public Staff shows the following:

1. On pages 22 to 23 of the 2016 IRP Order, the Commission stated that:

The analyses regarding reserve margin targets is extremely technical and complicated, made even more so by the advent of winter peaking on DEP and DEC's systems. The Commission relies heavily on the Public Staff's review and analysis to make its decisions on this subject. Therefore, the Commission determines that DEC and DEP should work with the Public Staff to address the Public Staff's and Mr. Wilson's reserve margin concerns and to implement changes as

necessary to help ensure that the reserve margin target(s) are fully supported in future IRPs. Further, the Commission requests that Duke and the Public Staff file a joint report summarizing their review and conclusions within 150 days of the filing of Duke's 2017 IRP updates. In addition to addressing the reserve margin concerns identified by the Public Staff and Mr. Wilson, the report should clearly define the support and basis for the targeted reserve margins incorporated into the IRPs. If the parties cannot reach consensus, then the report should outline their differences and recommend a procedure for the Commission to pursue in reaching a conclusion about the reserve margins recommended by DEC and DEP in their IRPs.

2. On September 1, 2017, DEC and DEP filed their 2017 IRP Updates, in which they acknowledged the concerns outlined by the Public Staff and Mr. Wilson's report regarding reserve margins and winter capacity planning, and indicating that Duke and the Public Staff plan to file a joint report summarizing the on-going review and conclusions within 150 days of the filing of the Companies' 2017 IRP updates as directed by the Commission.

3. Since the issuance of the 2016 IRP Order, Duke and the Public Staff have had further discussions to identify and address these issues, including meetings on July 25, 2017, and December 12, 2017. In addition, Duke responded to multiple requests for information from the Public Staff regarding its reserve margin studies and evaluated multiple inputs and scenarios that were suggested by the Public Staff to see if common agreement could be reached regarding the reserve margin targets utilized by DEC and DEP.

4. While discussions have been helpful, the Public Staff and Duke have not reached consensus on these issues. Therefore, the Public Staff requests that

the deadline for filing the joint report be extended until Friday, February 16, 2018, in order to provide additional time for Duke and the Public Staff to summarize their conclusions, to outline their differences, and to recommend a procedure for the Commission to pursue in reaching a conclusion about the reserve margins recommended by DEC and DEP in their IRPs.

5. The Public Staff has notified Duke of this request and Duke indicated that it does not object to the Public Staff's requested extension.

THEREFORE, the Public Staff respectfully prays:

1. That the Commission issue an order extending the date by which Duke and the Public Staff shall file the joint report called for in the 2016 IRP Order from January 30, 2018 to February 16, 2018; and

2. For such other and further relief as the Commission may deem just and proper.

Respectfully submitted, this the 30th day of January, 2018.

PUBLIC STAFF
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Executive Director

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Electronically submitted
s/ Tim R. Dodge
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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing Motion for Extension on each of the parties of record in this proceeding or their attorneys of record either by electronic delivery or by deposit in the U.S. Mail, postage prepaid.

This the 30th day of January, 2018.

Electronically submitted
s/ Tim R. Dodge