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## North Carolina Electric Membership Corporation



N.C Utilities Commission

August 24, 2011

#### VIA HAND DELIVERY

Renne Vance, Chief Clerk North Carolina Utilities Commission 430 North Salisbury Street Dobbs Building Raleigh, NC 27603-5918

> Re: Docket No. E-100, Sub 128 Docket No. E-100, Sub 131

Dear Ms. Vance:

Enclosed for filing please find an original and thirty (30) copies of a Joint Motion of North Carolina Electric Membership Corporation ("NCEMC") and GreenCo Solutions, Inc. ("GreenCo") for an Extension of Time to File NCEMC's 2011 Annual Report and GreenCo's 2011 REPS Compliance Plan and 2010 Compliance Report. Please note that GreenCo's 2011 Plan and 2010 Report includes data for Mecklenburg Cooperative and Broad River Cooperative, who have requested that GreenCo serve as their aggregator for such purposes.

Upon filing, please return one file-stamped copy to me in the self-addressed envelope. Should you have any questions, please do not hesitate to contact me at 919.875.3121.

Sincerely,

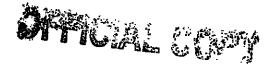
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Richard M. Feathers Vice President and Associate General Counsel

RMF/bl cc: Parties of Record

Enclosures

A Touchstone Energy\* Partner



#### STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

FILED

AUG 2 4 2011 Clerk's Office N.C Utilities Commission

#### DOCKET NO. E-100, SUB 128 DOCKET NO. E-100, SUB 131

#### **BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

In the Matter of:	)
	)
Investigation of Integrated Resource Planning	) JOINT MOTION OF NORTH CAROLINA
in NC-2010	) ELECTRIC MEMBERSHIP
	) CORPORATION AND GREENCO
and	) SOLUTIONS, INC., FOR EXTENSION OF
	) TIME TO FILE NCEMC'S 2011 ANNUAL
In the Matter of:	) REPORT AND GREENCO'S 2011 REPS
	) COMPLIANCE PLAN AND 2010
2011 REPS Compliance Plans and 2010 REPS	) COMPLIANCE REPORT
Compliance Reports	)

NOW COMES North Carolina Electric Membership Corporation ("NCEMC") and

GreenCo Solutions, Inc. ("GreenCo"), pursuant to Commission Rule R1-7 and jointly move the

North Carolina Utilities Commission ("NCUC" or "Commission") for an extension to time

through and including September 19, 2011, to file NCEMC's Annual Report and GreenCo's

2011 REPS Compliance Plan and 2010 Compliance Report. In support of their motion, NCEMC

and GreenCo show the Commission as follows:

1. Pursuant to NCUC Rule R8-60(h), NCEMC's 2011 Annual Report is due to be filed with the NCUC by September 1, 2011.

2. Pursuant to NCUC Rules R8-67(b)(1) and (c)(1), GreenCo is to file its 2011

REPS Compliance Plan and 2010 Compliance Report on September 1, 2011.

3. As part of its resource planning process for the 2011 Annual Report, NCEMC will present its 2011 Load Forecast for approval to the NCEMC Board of Directors at its regular scheduled meeting on September 14, 2011.

4. The requested extension of time will enable NCEMC's Annual Report to reflect the impact of its newly-revised and improved load forecast methodology.

5. Because GreenCo's anticipated filings similarly rely, in part, on the load forecasting information provided by NCEMC and thus applicable to the majority of GreenCo's member-cooperatives, GreenCo desires to extend its filing deadline in order that its filings similarly reflect the load forecasting improvements.

6. Counsel for NCEMC and GreenCo has communicated with counsel for the Public Staff and has been authorized to represent that the Public Staff does not oppose this joint motion for extension of time.

7. NCEMC and GreenCo submit that the requested extension of time will not prejudice the NCUC or any party's ability to investigate NCEMC's 2011 Annual Report or GreenCo's 2011 REPS Compliance Plan and 2010 Compliance Report, and is necessary to enable NCEMC and GreenCo to provide complete and accurate reports.

WHEREFORE, NCEMC and GreenCo respectfully request that the Commission grant their motion for extension of time through and including September 19, 2011, to file NCEMC's 2011 Annual Report and GreenCo's 2011 REPS Compliance Plan and 2010 Compliance Report, and grant such further relief as the Commission deems just and proper. Respectfully submitted this the 24<sup>th</sup> day of August, 2011.

# NORTH CAROLINA ELECTRIC MEMBERSHIP CORPORATION,

and

### **GREENCO SOLUTIONS, INC.**

By:

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Richard M. Feathers Vice President and Associate General Counsel Post Office Box 27306 Raleigh, NC 27611-7306 Telephone: (919) 872-0800 Email: <u>rick.feathers@ncemcs.com</u>

#### **CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing document has been served upon all parties of record by depositing copies thereof in the United States mail, first class postage prepaid.

This the 24th day of August, 2011.

Baffirk

**Richard M. Feathers**