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May 7, 2021

VIA ELECTRONIC FILING

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

RE: Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Further Motion for Extension of Time to File Reply Comments

Docket No. E-100, Sub 165

Dear Ms. Campbell:

I enclose Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Further Motion for Extension of Time to File Reply Comments.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

Enclosure

cc: Parties of Record

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)
) DUKE ENERGY CAROLINAS,
2020 Biennial Integrated Resource) LLC AND DUKE ENERGY
Plan Reports And Related 2020 REPS) PROGRESS, LLC'S MOTION
Compliance Plans) FOR FURTHER EXTENSION OF
) TIME TO FILE REPLY
) COMMENTS
)

NOW COME Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "the Companies") pursuant to Commission Rule R1-7 and respectfully request that the North Carolina Utilities Commission ("Commission") further extend the time, through and including May 28, 2021, for all parties to file reply comments in this 2020 Integrated Resource Plan ("IRP") and REPS Compliance Plan docket. In support of this motion, the Companies show the Commission as follows:

- 1. DEC and DEP filed their 2020 IRPs and REPS Compliance Plans on September 1, 2020, subsequently amended on September 16, 2020 and on November 6, 2020.
- 2. Pursuant to Commission Rule R8-60(k), the Public Staff or any other intervenor may file evaluations, alternative plans or initial comments within 150 days after September 1 or the filing of each utility's IRP. Additionally, within 60 days after the filing of initial comments, the parties may file reply comments.

- 3. On December 29, 2020, the Public Staff filed a motion requesting that the date for initial comments on IRPs be extended from January 29, 2021 to February 26, 2021 and that the date for reply comments be extended from March 30, 2021 to April 27, 2021. The Commission granted the motion on January 8, 2021.
- 4. On February 26, 2021, the Attorney General's Office filed a motion requesting that the date for initial comments on IRPs be extended to March 1, 2021 and that the date for reply comments be extended to April 30, 2021. The Commission granted the motion on February 26, 2021.
- 5. On April 16, 2021, the Companies filed a joint motion requesting that the date for reply comments be extended from April 30, 2021 to May 14, 2021. The Commission granted the motion on April 19, 2021.
- 6. As noted in the April 16, 2021 motion for extension, substantive initial intervenor comments and exhibits totaling approximately 2600 pages were served on the undersigned counsel by the Public Staff, the North Carolina Sustainable Energy Association ("NCSEA"), the Carolinas Clean Energy Business Association ("CCEBA"), the Southern Alliance for Clean Energy ("SACE"), the Sierra Club, the Natural Resources Defense Council ("NRDC"), the Attorney General's Office, the Tech Customers, Vote Solar, the City of Charlotte, and the City of Asheville jointly with Buncombe County. Notably, certain parties filed extensive technical studies, and alternative proposals as exhibits to their comments.
- 7. The Companies are working diligently to evaluate these extensive comments and supporting exhibits and prepare reply comments. However, as detailed above, parties to this proceeding have filed voluminous comments including multiple

technical studies and alternative proposals that are complex and require significant evaluation and, in certain cases, investigation through serving discovery to appropriately respond.

- 8. Since the Companies' April 16, 2021 motion, the Companies have received additional data request responses from certain intervenors. On May 4, 2021, the Attorney General's Office filed Corrected Initial Comments.
- 9. Furthermore, personnel that support the Companies' IRP process have been participating in an evidentiary hearing before the Public Service Commission of South Carolina, Docket Nos. 2019-224-E and 2019-225-E, that began April 26, 2021 and concluded on May 5, 2021. Prior to April 26, 2021, many of the DEC and DEP employees who support the IRP docket in North Carolina were involved in preparations for the South Carolina IRP hearing.
- 10. The Companies submit that no party will be prejudiced by the requested extension.
- 11. The undersigned counsel has contacted counsel for all parties of record regarding this motion via electronic mail, and no counsel for any party who has responded has indicated any objection to the Companies' motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant their joint motion for an additional two-week extension of time through and including May 28, 2021 for all parties to file their reply comments, and grant such further relief as the Commission deems just and proper.

Respectfully submitted this the 7th day of May, 2021.

Lawrence B. Somers

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Attorneys for Duke Energy Carolinas and Duke Energy Progress

CERTIFICATE OF SERVICE

I certify that Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Further Motion for Extension of Time to File Reply Comments, in Docket No. E-100, Sub 165, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties of record

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This the 7th day of May, 2021.

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