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April 15, 2014

## **VIA ELECTRONIC FILING**

Ms. Gail L. Mount, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4325

RE: Docket No. E-100, Sub137

Duke Energy Carolinas, LLC, Duke Energy Progress, Inc. and Dominion North Carolina Power's Joint Motion for Extension of Time

Dear Ms. Mount:

I enclose Duke Energy Carolinas, LLC, Duke Energy Progress, Inc. and Dominion North Carolina Power's Joint Motion for Extension of Time for filing in connection with the referenced matter.

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

Sincerely,

Lawrence B. Somers

**Enclosures** 

cc: Parties of Record

# STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

### **DOCKET NO. E-100, SUB 137**

### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)
	) DUKE ENERGY CAROLINAS,
2013 Integrated Resource Plans	) DUKE ENERGY PROGRESS
And Related 2013 REPS Compliance	) AND DOMINION NORTH
Plans	) CAROLINA POWER'S JOINT
	) MOTION FOR EXTENSION OF
	) TIME TO FILE REPLY
	) <b>COMMENTS</b>
	)

NOW COME Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, Inc. ("DEP") and Virginia Electric Power Company, d/b/a Dominion North Carolina Power ("Dominion") (collectively "the Utilities") pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission ("Commission") for an extension of time through and including May 23, 2014, for the Utilities' to file reply comments in this 2013 Integrated Resource Plan Update and REPS Compliance Plan docket. In support of this motion, DEC, DEP and Dominion show the Commission as follows:

- 1. Dominion filed its 2013 IRP Update and REPS Compliance Plan on August 30, 2013, and DEC and DEP filed their 2013 IRP Updates and REPS Compliance Plans on October 15, 2013. On March 7, 2014, DEC and DEP filed supplements to their IRP Updates.
- 2. Pursuant to the Commission's March 13, 2014, *Order Granting Further Extensions of Time*, intervenors' initial comments were due to be filed by April 11, 2014, and the Utilities' reply comments are due to be filed by April 25, 2014.

- 3. Substantive initial intervenor comments and exhibits totaling approximately 272 pages were served on the undersigned counsel by the Public Staff, the North Carolina Waste Awareness and Reduction Network ("NC WARN"), the Sierra Club and Southern Alliance for Clean Energy ("SACE"), Mid-Atlantic Renewable Energy Coalition ("MAREC"), and the North Carolina Sustainable Energy Association ("NCSEA") before or after the close of business on Friday, April 11, 2014, and on Saturday, April 12, 2014.
- 4. Intervenors have had since September 1, 2013 to review, conduct discovery, and prepare initial comments as to Dominion's IRP update and since October 15, 2013 as to DEC and DEP.
- 5. DEC and DEP intend to send discovery requests to intervenors regarding their initial comments and need additional time to receive intervenor discovery responses and prepare their reply comments, accordingly. DEC and DEP respectfully submit that the current two week deadline to do so is insufficient.
- 6. Dominion is also reviewing the intervenor initial comments filed in this proceeding and evaluating whether discovery may be necessary to fully respond. Further, the Virginia State Corporation Commission ("Virginia Commission") has scheduled an evidentiary hearing in its review Dominion's 2013 IRP to begin April 25, 2014. Due to the potential for discovery in the instant proceeding and the need for Dominion personnel responsible for developing Dominion' reply comments in this case to also prepare for the evidentiary hearing before the Virginia Commission, Dominion also respectfully submits that the current two week deadline to file its reply comments is insufficient and would cause substantial hardship that warrants an extension of time.

WHEREFORE, Duke Energy Carolinas, Duke Energy Progress and Dominion North Carolina Power respectfully request that the Commission grant their joint motion for extension of time through and including May 23, 2014, to file their reply comments, and grant such further relief as the Commission deems just and proper.

This the 15<sup>th</sup> day of April, 2014.

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### **CERTIFICATE OF SERVICE**

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, Inc. and Dominion North Carolina Power's Joint Motion for Extension of Time in Docket No. E-100, Sub 137, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties for record:

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This is the 15<sup>th</sup> day of April, 2014.

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