Nov 09 2020

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

Docket No. E-100, Sub 101

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In the Matter of Petition for Approval of Revisions to Generator Interconnection Standards

GREENGO ENERGY'S MOTION FOR EXTENSION OF TIME TO FILE NOTICE OF APPEAL AND EXCEPTIONS

GreenGo Energy US, Inc. ("GreenGo"), through its undersigned attorneys, moves pursuant to N.C. Gen. Stat. § 62-90 and Commission Rule R1-7 for an extension of time to file notice of appeal and exceptions to the Commission's Order Granting Petition for Limited Waivers (the "Order") issued in the above-captioned proceeding on October 14, 2020. In support thereof, GreenGo states the following:

1. Pursuant to G.S. § 62-90(a), any party to a proceeding may appeal from a final order of the Commission within 30 days after the entry of such order, or within such time thereafter as may be fixed by the Commission, not to exceed 30 additional days.

2. The current deadline for filing a Notice of Appeal and exceptions from the Order pursuant to G.S. § 62-90(a) is November 13, 2020. GreenGo hereby requests an additional 30 days to complete its review of the Order and develop exceptions to be included in a Notice of Appeal, to be filed no later than Monday, December 14, 2020.

3. The Commission's Order raises issues of apparent first impression regarding the application of the nondiscrimination requirements of Chapter 62 to waivers of the interconnection procedures established in this proceeding. GreenGo requests more time so that it may fully evaluate the Order, its impact on GreenGo's potential business

operations and projects pending in the interconnection queue, and its legal and business options.

WHEREFORE, for the reasons set forth, GreenGo Energy US, Inc., respectfully requests that the Commission extend the time to file Notice of Appeal and exceptions to and including December 14, 2020.

Respectfully submitted, this 9th day of November, 2020.

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Attorneys for GreenGo Energy US, Inc.

Certificate of Service

I hereby certify that a copy of the foregoing *Motion for Extension of Time to File Notice of Appeal and Exceptions* has been served this day upon counsel of record by electronic mail.

This the 9th day of November, 2020

BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, LLP

By: \s\ Marcus Trathen