

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 147

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
2016 Integrated Resource Plans and)	MOTION FOR SECOND
Related 2016 REPS Compliance Plans)	EXTENSION OF TIME

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 January 30, 2018, the Public Staff filed a motion requesting that the date for the joint reserve margin report be extended to February 16, 2018. In support of its motion, the Public Staff stated that Duke and the Public Staff have had multiple meeting and discussions, and Duke had provided a large amount of information about its reserve margin studies, but the parties had not yet reached a consensus on the reserve margin issues and, therefore needed additional time to prepare the reserve margin report explaining their differences and recommending a procedure for the Commission to pursue. The Commission granted this request

in its *Order Granting Extension of Time to File Report* on February 1, 2018, in this Docket.

2. Since that time, the Public Staff and Duke have compiled a draft report and identified points of disagreement. However, the parties believe that additional time to meet and discuss these differences may result in a more refined set of issues for the Commission to consider. As such, the Public Staff requests a second extension of time to allow those further discussions to take place and be incorporated into the joint report.

3. Due to the pending general rate case in Docket No. E-7, Sub 1146 and the significant workload involved by all parties in that proceeding, the Public Staff requests that the extension be of sufficient length so as to provide time following the conclusion of the evidentiary hearing to continue these discussions. Therefore, the Public Staff requests that the deadline for filing the joint report be extended until Friday, March 30, 2018, in order to provide additional time for Duke and the Public Staff to incorporate these additional discussions into the joint report.

4. 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 February 16, 2018 to March 30, 2018; and

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

Respectfully submitted, this the 16th day of February, 2018.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

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 16th day of February, 2018.

Electronically submitted
s/ Tim R. Dodge