

Kendrick C. Fentress Associate General Counsel

Mailing Address: NCRH 20 / P.O. Box 1551 Raleigh, NC 27602

> o: 919.546.6733 f: 919.546.2694

Kendrick.Fentress@duke-energy.com

December 8, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

Re: Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and

Dominion Energy North Carolina's Joint Motion for Extension of

Time

Docket No. E-100, Sub 158

Dear Ms. Campbell:

Enclosed for filing in the above-referenced docket is Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Dominion Energy North Carolina's Joint Motion for Extension of Time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kendrick C. Fentress

Kendrick C. Sertons

cc: Parties of Record

Enclosure

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 158

)	JOINT MOTION FOR
In the Matter of)	EXTENSION OF TIME OF DUKE
Biennial Determination of Avoided Cost)	ENERGY CAROLINAS, LLC,
Rates for Electric Utility Purchases from)	DUKE ENERGY PROGRESS,
Qualifying Facilities – 2018)	LLC, AND DOMINION ENERGY
)	NORTH CAROLINA
)	

NOW COME Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP," and together with DEC, "Duke") and Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC," and together with Duke, "Joint Movants"), pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") and move the Commission for an extension of time through and including December 16, 2020, for Joint Movants to file reply comments as provided for in the Commission's November 5, 2020 *Order Allowing Comments on Storage Retrofit Stakeholder Meetings Report*.

In support of the foregoing, the Joint Movants show the Commission the following:

- 1. On April 15, 2020, the Commission issued an *Order Establishing Standard Rates and Contract Terms for Qualifying Facilities* (the "April 15 Order") in the above-referenced docket, requiring the Joint Movants to organize a stakeholder group to address the addition of storage at existing qualifying facilities and to file a report of the results of that stakeholder process on or before September 1, 2020.
- 2. After obtaining an extension from the Commission, the Joint Movants filed the Storage Retrofit Stakeholder Meetings Report on September 16, 2020 (the "Report").

- 3. On November 5, 2020, the Commission issued an *Order Allowing Comments on Storage Retrofit Stakeholder Meetings Report*, which allowed parties to file initial comments on or before November 20, 2020 and reply comments on or before December 11, 2020.
- 4. Duke would like to coordinate its response to the initial comments, as much as possible, with DENC. They are now working diligently to prepare joint reply comments; however, due to the press of other business and schedules, they require additional time to coordinate and finalize their joint reply comments.
- 5. Based on the foregoing, the Joint Movants request an extension of five days, up to and including December 16, 2020, to file their reply comments in this proceeding.
 - 6. The requested extension will not result in prejudice to any party.
- 7. Counsel for the Joint Movants have contacted counsel for all parties of record regarding this Motion, and no party has advised that it objects.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Dominion Energy North Carolina respectfully request that the Commission grant this Motion for an extension of time through and including Wednesday, December 16, 2020, for Joint Movants to file reply comments in this proceeding and such other relief as the Commission deems just and proper.

Respectfully submitted, this the 8th day of December, 2020.

/s/ Andrea R. Kells

Andrea R. Kells
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Phone: (919) 755-6614
akells@mcguirewoods.com

Attorney for Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina Kendrik C. dertress

Kendrick C. Fentress Associate General Counsel Duke Energy Corporation P.O. Box 1551/ NCRH 20 Raleigh, NC 27602

Phone: (919) 546-6733

kendrick.fentress@duke-energy.com

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC; Duke Energy Progress, LLC and Dominion Energy North Carolina's Joint Motion for Extension of Time, in Docket No. E-100, Sub 158, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 8th day of December, 2020.

Kendrick C. Fentress

Associate General Counsel

Duke Energy Corporation

Kendrick C. Sertress

P.O. Box 1551 / NCRH 20

Raleigh, NC 27602

Tel 919.546.6733

Fax 919.546.2694

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