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LAW OFFICE OF CHARLOTTE MITCHELL

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FILED
FEB 17 2016
Clerk's Office
N.C. Utilities Commission

February 17, 2016

Gail Mount
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603 – 5918

Re: Motion for Extension of Time, N.C.U.C. Docket No. E-100, Sub 140

Dear Ms. Mount:

Enclosed for filing on behalf of NCSEA in the above-referenced docket, please find enclosed NCSEA's Motion for Extension of Time.

Regards,



Charlotte A. Mitchell
NC Bar #34106
Law Office of Charlotte Mitchell, PLLC
PO Box 26212
Raleigh, North Carolina 27611
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E-mail: cmitchell@lawofficecm.com

4818-3851-9338, v. 1

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STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 140

FILED
FEB 17 2016
Clerk's Office
N.C. Utilities Commission

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Biennial Determination of Avoided Cost)	MOTION FOR EXTENSION OF
Rates for Electric Utility Purchases from)	TIME BY NCSEA
Qualifying Facilities - 2014)	

NOW COMES the North Carolina Sustainable Energy Association (“NCSEA”), by and through undersigned counsel, pursuant to North Carolina Utilities Commission (“Commission”) Rule R1-7, respectfully requests that the Commission issue an order extending the deadline for the filing of objections to the compliance filings made by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”), and Virginia Electric and Power Company d/b/a Dominion North Carolina Power (“DNCP”) (collectively, the “Utilities”) in this proceeding, as set out herein.

1. In its Order Establishing Standard Rates and Contract Terms for Qualifying Facilities, issued in the above-captioned docket on December 17, 2015 (the “Order”), the Commission directed DEC, DEP and DNCP to file new versions of their rate schedules and standard contracts, in compliance with the Order, which are to become effective fifteen (15) days after the filing date unless specific objections as to the accuracy of the calculations and conformity with the Order are filed within that 15-day period. Order, Ordering Paragraph 27.

2. NCSEA, having become a party to this proceeding pursuant to that Order Granting Petition to Intervene entered by the Commission on February 27, 2014, has

reviewed the compliance filings made by DEC, DEP and DNCP on February 2, 2016 in this proceeding (the "Compliance Filing(s)") and has been in discussion with the Utilities regarding same. However, due to the complexity involved, NCSEA needs additional time in which to complete its review and discussions. Therefore, NCSEA respectfully requests an extension of time, up to and until Thursday, February 25, 2016, in order to file specific objections, if necessary.

3. NCSEA has conferred with counsel for the Public Staff, the Utilities and the Southern Alliance for Clean Energy regarding this motion, and none of those parties objects to this request.

WHEREFORE, NCSEA respectfully requests that the Commission enter an order extending the time for the filing of specific objections as to the accuracy of the calculations and conformity with the Order up to and until February 25, 2016.

Respectfully submitted this the 17th day of February, 2016.



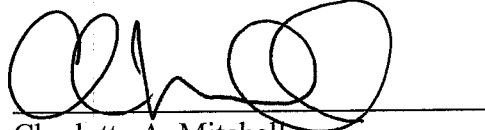
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ATTORNEY FOR NCSEA

CERTIFICATE OF SERVICE

The undersigned certifies that she has served a copy of the foregoing **MOTION FOR EXTENSION OF TIME BY NCSEA** upon the parties of record in this proceeding, or their attorneys, by electronic mail.

This 17th day of February, 2016.


Charlotte A. Mitchell

4842-8445-7518, v. 2