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May 20, 2021

Ms. Kimberley A. Campbell, Chief Clerk North Carolina Utilities Commission 430 N. Salisbury Street Raleigh, NC 27603

> Joint Petition for Approval of Model Small Generation Interconnection Standards & Associated Application to Interconnect & Interconnection Contract Forms NCUC Docket No. E-100, Sub 101

Dear Ms. Campbell:

RE:

On behalf of Strata Solar, LLC and Strata Solar Development, LLC and Duke Energy Progress, LLC and Duke Energy Carolinas, LLC, we submit the attached **Joint Motion for Further Extension of Time to File Reply Comments** in the above-referenced docket.

Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

Karen M. Kemerait

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cc: All parties of record Enclosures

A Pennsylvania Limited Liability Partnership

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of: Joint Petition for Approval of Model Small Generation Interconnection Standards & Associated Application to Interconnect & Interconnection Contract Forms

JOINT MOTION FOR FURTHER EXTENSION OF TIME TO FILE REPLY COMMENTS

NOW COME Strata Solar, LLC and Strata Solar Development, LLC (collectively, "Strata") and Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP" and together with DEC, "Duke"), by and through counsel and pursuant to Rules R1-7 and R1-9 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), and move the Commission for an additional extension of time for thirty (30) days to file reply comments.

In support of this Motion, Strata and Duke show the Commission the following:

- 1. On March 9, 2021, the Commission issued its *Order Seeking Comments*Regarding Generator Inspection Provisions of the North Carolina Generator

 Interconnection Standards ("Order Seeking Comments"). In the Commission's Order

 Seeking Comments, the Commission requested comments from the parties as to their

 concerns regarding the inspection of facilities.
- 2. By Order dated March 16, 2021, the Commission extended the times for all parties to file comments until March 29, 2021 and reply comments until April 12, 2021.

- 3. On March 29, 2021, Duke filed comments, Strata and the Carolinas Clean Energy Business Association ("CCEBA") filed joint comments, and the Public Staff filed a letter in lieu of comments.
- 4. On April 7, 2021, Strata and CCEBA requested an extension of time for fourteen (14) days for the parties to file reply comments so that they could have discussions with Duke and the Public Staff about issues related to the inspection of the facilities. On April 12, 2021, the Commission granted the extension of time for the parties to file reply comments.
- 5. On April 19, 2021, Strata and CCEBA requested a further extension of time for thirty (30) days for the parties to file reply comments. By order dated April 20, 2021, the Commission granted the extension of time for the parties to file reply comments by May 26, 2021.
- 6. Strata and Duke have been engaging in discussions about the resolution of issues related to the inspection of facilities, and they expect to reach a settlement of the issues within the next thirty (30) days. Therefore, Strata and Duke request an extension of time for additional thirty (30) days so that they may finalize the terms of the settlement.
- 7. CCEBA and the Public Staff have indicated that they do not oppose Strata's and Duke's request for an additional extension of time for thirty (30) days for the parties to file reply comments.

WHEREFORE, Strata and Duke respectfully request that the Commission grant an additional thirty (30)-day extension of time so that the parties may file reply comments on or before June 25, 2021.

Respectfully submitted this 20th day of May, 2021.

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Attorney for Strata Solar, LLC and Strata Solar

Development, LLC

/s/ Jack E. Jirak

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing MOTION FOR FURTHER EXTENSION OF TIME TO FILE REPLY COMMENTS has been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

This 20th day of May, 2021.

/s/ Karen M. Kemerait

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