

Burgos, Alexander N

Subject: FW: [External] RE: August 2023 RRC Request for Changes - 14B NCAC 16

From: Gray, Jeffrey
Sent: Wednesday, August 9, 2023 7:07 PM
To: 'Liebman, Brian R' <brian.liebman@oah.nc.gov>
Subject: RE: August 2023 RRC Request for Changes - 14B NCAC 16

Brian:

Without question I am going to need an extension of time. Except for changes made due to Public Comment (which was clearly noted on the Submission form) these rule adoption and amendments are identical to the Temporary rules submitted by the agency and reviewed by you in March 2023. However, there are far more Request for Change this time around for the Permanent rules. For instance, for the Temporary rule amendments in .0807 you had six requested changes, some of which you appear to have accepted my then-explanation and not made a second request, albeit now there are over a dozen more requests for changes to this same rule. Similarly, there were no Request for Change for .1101 as Temporary rule amendments, but now there are eight.

Seeing that I was given only three and a half days to accomplish this, it is not possible to reconcile everything you have asked, answer your numerous additional questions, and properly make the changes. I hereby request that the period of review be extended.

Having submitted the Permanent rule amendments and adoptions to the Commission, pursuant to G.S. 150B-21.1(d) the agency's Temporary rules remain effective.

Jeff

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