BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1251

In the Matter of Application of Duke Energy Progress, LLC for Approval of Renewable Energy and Energy Efficiency Portfolio Standard (REPS) Compliance Report and Cost Recovery Rider Pursuant to N.C. Gen. Stat. § 62-133.8 and Commission Rule R8-67	)	**DIRECT TESTIMONY OF VERONICA I. WILLIAMS**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Veronica I. Williams, and my business address is 550 South Tryon Street, Charlotte, North Carolina.

Q. PLEASE STATE YOUR POSITION WITH DUKE ENERGY AND DESCRIBE YOUR CURRENT RESPONSIBILITIES.

A. In my capacity as Rates and Regulatory Strategy Manager, I am responsible for providing regulatory support related to retail and wholesale rates, providing guidance on Renewable Energy and Energy Efficiency Portfolio Standard ("REPS") compliance and cost recovery for Duke Energy Progress, LLC ("Duke Energy Progress," "DEP," or the "Company") and Duke Energy Carolinas, LLC ("Duke Energy Carolinas" or "DEC"), and preparing and filing testimony and exhibits in annual DEP and DEC REPS rider proceedings.

Q. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATIONAL BACKGROUND, BUSINESS BACKGROUND AND PROFESSIONAL AFFILIATIONS.

A. I received a Bachelor of Science degree in Business from the University of North Carolina at Charlotte. I am a certified public accountant licensed in the state of North Carolina. I began my career with Duke Power Company (now known as Duke Energy Carolinas) as an internal auditor and subsequently worked in various departments in the finance organization. I joined the Rates Department in 2001.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE NORTH CAROLINA UTILITIES COMMISSION?

A. Yes. I most recently provided testimony in Docket No. E-7, Sub 1229 regarding Duke Energy Carolinas' 2019 REPS compliance report and application for approval of its REPS cost recovery rider, and in Docket No. E-2, Sub 1205 regarding Duke Energy Progress' 2018 REPS compliance report and application for approval of its REPS cost recovery rider.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe the calculation of and present the support for the REPS rider proposed by Duke Energy Progress under N.C. Gen. Stat. ("G.S.") § 62-133.8 and to present the information and data required by Commission Rule R8-67 as set forth in Williams Exhibit Nos. 1 through 4. The test period used in supplying this information and data is the twelve months beginning on April 1, 2019 and ending on March 31, 2020 ("Test Period" or "EMF Period"), and the billing period for the REPS rider requested in the Company's application is the twelve months beginning on December 1, 2020 and ending on November 30, 2021 ("Billing Period").

Q. PLEASE DESCRIBE THE EXHIBITS TO YOUR TESTIMONY.

A. Williams Confidential Exhibit No. 1 ("Williams Exhibit No. 1") identifies the total incremental REPS compliance costs for which the Company seeks recovery from Duke Energy Progress North Carolina Retail ("NC Retail") customers. Williams Confidential Exhibit No. 2 ("Williams Exhibit No. 2") shows the allocation of the total REPS compliance costs, identified in Williams Exhibit No. 1, to the Company's NC Retail customer classes for the Test Period. Williams Confidential Exhibit No. 3 ("Williams Exhibit No. 3") shows the

allocation of the total expected REPS compliance costs, identified on Williams Exhibit No. 1, to the Company's NC Retail customer classes for the Billing Period. Williams Exhibit No. 4 shows the total REPS rider amounts proposed, including the REPS Experience Modification Factor ("EMF"), by customer class, compared to the cost cap for each customer class. Finally, Williams Exhibit No. 5 is a worksheet detailing the Company's energy efficiency ("EE") certificate ("EEC") inventory balance as of December 31, 2019.

Q. WERE THESE EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER YOUR SUPERVISION?

A. Yes.

Q. WHAT COSTS ARE INCLUDED IN DUKE ENERGY PROGRESS' PROPOSED REPS RIDER?

A. The proposed REPS rider intends to recover Duke Energy Progress' incremental costs of compliance with the renewable energy requirements pursuant to G.S. § 62-133.8. The costs incurred by the Company to comply with its REPS compliance requirements are described comprehensively in the testimony of Company witness Jennings, and detailed in Jennings Confidential Exhibit Nos. 2 and 3, filed in this docket. The costs incurred during the Test Period are presented in this filing to demonstrate their reasonableness and prudency as provided in North Carolina Utilities Commission ("Commission") Rule R8-67(e).

The rider includes the REPS EMF component to recover the difference between the compliance costs incurred and revenues realized during the Test

Period. The proposed rider also includes a component to recover the costs expected to be incurred for the Billing Period.

Q. PLEASE DESCRIBE THE METHODOLOGY DUKE ENERGY PROGRESS USED TO CALCULATE THE INCREMENTAL COSTS OF COMPLIANCE WITH THE REPS REQUIREMENTS.

A. Company witness Jennings describes the costs Duke Energy Progress incurred during the Test Period and the costs it projects to incur during the Billing Period to comply with its REPS requirements. North Carolina General Statute § 62-133.8(h)(1) provides that "incremental costs" means "all reasonable and prudent costs incurred by an electric power supplier" to comply with the REPS requirements "that are in excess of the electric power supplier's avoided costs other than those costs recovered pursuant to G.S. § 62-133.9."

For purchased power agreements with renewable energy facilities, Duke Energy Progress subtracted its avoided cost, as determined pursuant to R8-67(a)(2), from the total cost associated with each renewable energy purchase to arrive at the incremental cost related to the renewable energy purchase during the period in question. For biogas purchases used to produce renewable energy at the Company's generating stations, the incremental costs incurred for the Test Period and estimated for the Billing Period are calculated by subtracting the applicable avoided costs (as determined pursuant to R8-67(a)(2)) from the total biogas costs associated with the MWhs generated.

Consistent with Rule R8-67(e)(2), which provides that the cost of an unbundled renewable energy certificate ("REC") "is an incremental cost and

has no avoided cost component," the total costs for REC purchases incurred during the Test Period, and forecast for the Billing Period, are included as incremental costs.

As described in detail by Company witness Jennings in her direct testimony filed in this docket, the REPS EMF and Billing Period components of the proposed REPS rider also include compliance-related incremental administration costs, labor costs, and costs related to research incurred during the EMF Period and estimated for the Billing Period, respectively. As further detailed witness Jennings' testimony, amounts equal to the annual amortizations of Solar Rebate Program costs incurred pursuant to G.S. § 62-155(f) applicable to the Test Period and the Billing Period are included for recovery in the proposed REPS rider.

Q. PLEASE DESCRIBE HOW DUKE ENERGY PROGRESS ALLOCATES INCREMENTAL REPS COSTS AMONG CUSTOMER CLASSES FOR REPS AND REPS EMF RIDER PURPOSES.

A. Incremental costs assigned to Duke Energy Progress' NC Retail customers are separated into two categories: costs related to solar, poultry and swine waste compliance requirements, and research and other incremental and Solar Rebate costs ("Set-Aside and Other Incremental Costs"); and costs related to the General Requirement[1] ("General Incremental Costs"). This separation is based on the percentages of Set-Aside and Other Incremental Costs, and General Incremental Costs, calculated on Williams Exhibit No. 1

[1] The Company generally refers to the "General Requirement" as its overall REPS requirement, set forth in N.C. Gen. Stat. § 62-133.8(b), net of the three set-asides.

Set-Aside and Other Incremental Costs are allocated among customer classes based on per-account cost caps. General Incremental Costs are allocated among customer classes in a manner that gives credit for EE RECs (for which there are no General Incremental Costs) according to the relative energy reduction contributed by each customer class. As a result, General Incremental Costs are allocated among customer classes based on each class' pro-rata share of requirements for non-EE general RECs. The calculations for allocating General Incremental Costs reflect the updated method recommended by the Public Staff, and accepted by the Commission in its November 17, 2017 *Order Approving REPS and REPS EMF Rider and Approving REPS Compliance Report* in DEP's 2017 REPS rider filing in Docket No. E-2, Sub 1144. The Company notes that any deviation from allocating costs according to the statutory per-account cost cap ratios creates the potential for the resulting charges computed for one or more classes to exceed the per-account cost cap(s). If that occurs, the Company would continue to reallocate the costs in excess of the cap for the affected customer class to the other customer classes to the extent required to produce charges for all classes that do not exceed the respective caps.

Q. PLEASE DESCRIBE HOW DUKE ENERGY PROGRESS CALCULATED THE PROJECTED PORTION OF THE REPS RIDER THAT THE COMPANY PROPOSES FOR THE BILLING PERIOD.

A. Using the allocation methods described above, and as shown on Williams Exhibit No. 3, the Set-Aside and Other Incremental Costs and the General

Incremental Costs are calculated by customer class for the Company's NC Retail customers. The Set-Aside and Other Incremental Costs and General Incremental Costs are summed for the Billing Period by customer class to arrive at a total REPS cost to be collected from the Company's NC Retail customers. On Williams Exhibit No. 4, the cost allocated to each customer class is then divided by the total projected number of Duke Energy Progress NC Retail accounts within each customer class to arrive at the total annual cost to be recovered from each account over the Billing Period. The monthly NC Retail REPS rider for each customer class is one-twelfth of the total annual cost.

Q. PLEASE EXPLAIN THE CALCULATION OF THE PROPOSED REPS EMF.

A. Using the allocation methods described above, and as shown on Williams Exhibit No. 2, the Set-Aside and Other Incremental Costs and the General Incremental Costs are calculated by customer class for the Company's NC Retail customers. The Set-Aside and Other Incremental Costs and General Incremental Costs are summed for the Test Period by customer class to illustrate the total REPS cost assigned to the Company's NC Retail customers. The actual NC Retail revenues realized during the Test Period by customer class are then subtracted from the total REPS costs by customer class to arrive at the EMF for each class. On Williams Exhibit No. 4, the total EMF over/under collection to be recovered from each customer class is adjusted to include any credits to customers not considered a refund of amounts advanced by customers, and then divided by the total projected number of Duke Energy

Progress NC Retail accounts within each customer class to arrive at the total EMF to be recovered from each account over the Billing Period. The monthly EMF for each customer class is one-twelfth of the total EMF.

Q. DOES DUKE ENERGY PROGRESS DEFINE A "CUSTOMER" FOR PURPOSES OF REPS BILLING IN ACCORDANCE WITH THE COMMISSION'S ORDER ISSUED NOVEMBER 12, 2009 IN DOCKET NO. E-2, SUB 948?

A. Yes. Consistent with the Commission's order issued November 12, 2009 in Docket No. E-2, Sub 948, for purposes of REPS billing, a customer is defined as all accounts (metered and unmetered) serving the same customer of the same revenue classification located on the same or contiguous properties. If a customer has accounts that serve in an auxiliary role to a main account on the same premises, no REPS charge applies to the auxiliary accounts, regardless of their revenue classification. Upon written notification from the customer, accounts meeting these criteria are coded in the billing system to allow the customer to receive only one monthly REPS charge for all identified accounts.

Q. DOES THE COMPANY PROJECT THE REPS CHARGE TO EACH CUSTOMER ACCOUNT FOR THE BILLING PERIOD TO BE WITHIN THE ANNUAL COST CAPS DEFINED IN N.C. GEN. STAT. § 62-133.8?

A. Yes. In NC House Bill 589 (S.L. 2017-192), the General Assembly revised G.S. § 62-133.8(h)(4) to lower the annual cost cap for the Residential customer class from $34.00 to $27.00 in years subsequent to 2014, for cost recovery proceedings initiated on or after July 1, 2017. Accordingly, the Company has

applied that revision to the cost caps in this cost recovery proceeding. As shown in Williams Exhibit No. 4, the annual charge for each customer class, including regulatory fee, is below the per-account cap as defined in N.C. Gen. Stat. § 62-133.8.

Q. HOW DOES DUKE ENERGY PROGRESS PROPOSE TO COLLECT THE REPS CHARGES FROM EACH CUSTOMER CLASS?

A. The Company proposes a fixed monthly charge be added to the bill for each class of customer.

Q. WHAT IS THE MONTHLY REPS CHARGE PROPOSED BY THE COMPANY FOR EACH CUSTOMER CLASS?

A. The Company proposes the following REPS charges to be effective December 1, 2020.

Customer class	Per month – excluding regulatory fee	Per month – including regulatory fee	Annual – including regulatory fee	Annual per account cost cap
Residential	$ 1.29	$ 1.29	$ 15.48	$ 27.00
General	$ 6.97	$ 6.98	$ 83.76	$ 150.00
Industrial	$ 47.82	$ 47.88	$ 574.56	$ 1,000.00

Q. WHAT IS THE CHANGE IN THE MONTHLY REPS CHARGE PROPOSED BY THE COMPANY FOR EACH CUSTOMER CLASS?

A. The following tables show the proposed monthly REPS rider charges, and a comparison to the monthly REPS rider charges currently in effect – with and without the regulatory fee applied.

Excluding regulatory fee

	Proposed			Current			Change		
Customer class	EMF	Rider	Total	EMF	Rider	Total	EMF	Rider	Total
Residential	**$ 0.00**	**$ 1.29**	**$ 1.29**	$ 0.06	$ 1.39	$ 1.45	$ (0.06)	$(0.10)	$ (0.16)
General	**$(0.74)**	**$ 7.71**	**$ 6.97**	$(0.60)	$ 8.84	$ 8.24	$(0.14)	$(1.13)	$ (1.27)
Industrial	**$(6.67)**	**$54.49**	**$47.82**	$(3.57)	$63.07	$59.50	$(3.10)	$(8.58)	$(11.68)

Including regulatory fee:

	Proposed			Current			Change		
Customer class	EMF	Rider	Total	EMF	Rider	Total	EMF	Rider	Total
Residential	**$ 0.00**	**$ 1.29**	**$1.29**	$ 0.06	$ 1.39	$ 1.45	$ (0.06)	$ (0.10)	$ (0.16)
General	**$(0.74)**	**$ 7.72**	**$ 6.98**	$(0.60)	$ 8.85	$ 8.25	$ (0.14)	$ (1.13)	$ (1.27)
Industrial	**$(6.68)**	**$54.56**	**$47.88**	$(3.57)	$63.15	$59.58	$ (3.11)	$ (8.59)	$(11.70)

Q. PLEASE DESCRIBE THE EEC INVENTORY DETAILS PRESENTED IN WILLIAMS EXHIBIT NO. 5.

A. Williams Exhibit No. 5 shows a reconciliation of the Company's EEC inventory balance available for REPS compliance as of December 31, 2019, as well as references to the evaluation, measurement and verification ("EM&V") reports the results of which are incorporated into current EEC balances. The Company annually determines the level of EECs generated and available for REPS compliance, and this update includes the results of any periodic EM&V performed to-date, adjustments identified in the course of the Company's ongoing analysis of energy efficiency program effectiveness, as well as any other corrections. The updated cumulative level of EECs generated to date is compared to the number of EECs previously reported for compliance, less any EECs used for compliance, to determine the EECs to be added to inventory in the North Carolina Renewable Energy Certificate Tracking System for the most

recent calendar year. Williams Exhibit No. 5 shows the calculation of EECs added to inventory for 2019, including details of the adjustments incorporated therein.

Q. DOES THE COMPANY CONTINUE TO INCORPORATE THE COMMISSION'S ORDER ADDRESSING THE DURATION OF ENERGY EFFICIENCY SAVINGS AS CALCULATED FOR REPS COMPLIANCE PURPOSES?

A. Yes. In its January 17, 2017 *Order Approving REPS and REPS EMF Rider and REPS Compliance Report* in the Duke Energy Progress REPS Docket No. E-2, Sub 1109, the Commission directed DEP to limit its continued recognition of EE savings initiated in a particular EE program year to the life of the measure or program as established in DEP's energy efficiency rider proceedings held pursuant to G.S. § 62-133.9. Consistent with that Order, in this rider filing DEP continues to calculate EE savings only for the duration of the established measure life of each program or measure.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

REDACTED VERSION

DUKE ENERGY PROGRESS, LLC
Docket No. E-2, Sub 1251
Compliance Costs for the EMF Period April 1, 2019 to March 31, 2020

Williams Exhibit No. 1
Page 1 of 2
June 9, 2020

Line No.	Renewable Resource	RECs - Jennnings Exhibit No. 2	MWh (Energy)	Total Cost - Jennings Exhibit No. 2	Avoided Cost	Incremental Cost	Avoided Cost Recovered in Fuel Cost Adjustment Rider
1	[redacted]						
2							
3							
4							
5							
6							
7							
8	Other Incremental cost			$ 1,494,316	Jennings Exhibit No. 2	$ 1,494,316 (f)	
9	Solar Rebate Program			$ 1,011,806		$ 1,011,806 (g)	
10	Research			$ 798,548		$ 798,548 (h)	
11	**Total**			**$ 232,647,165** Jennings Exhibit No. 2		**$ 39,775,219** (below)	

	Incremental cost category	Incremental Cost	Percent of Total Incremental Cost
12	[redacted]		
13			
14	**Total**	**$ 39,775,219** (above)	**100.00%**

Allocate estimated incremental cost of solar resources between solar compliance requirement and general compliance requirement:

15	[redacted]
16	
17	
18	
19	
20	

REDACTED VERSION

DUKE ENERGY PROGRESS, LLC
Docket No. E-2, Sub 1251
Compliance Cost for the Billing Period December 1, 2020 to November 30, 2021

Williams Exhibit No. 1
Page 2 of 2
June 9, 2020

Line No.	Renewable Resource	RECs - Jennings Exhibit No. 2	MWh (Energy)	Total Cost - Jennings Exhibit No. 2	Avoided Cost	Incremental Cost	Avoided Cost Recovered in Fuel Cost Adjustment Rider
1	[redacted]						
2							
3							
4							
5							
6							
7							
8							
9	Other Incremental cost			$ 1,578,000	Jennings Ex. No. 2	$ 1,578,000 (g)	
10	Estimated receipts related to contract performance			$ (500,000)		$ (500,000) (h)	
11	Solar Rebate Program			$ 1,958,668		$ 1,958,668 (i)	
12	Research			$ 931,500		$ 931,500 (j)	
13	**Total**			**$ 188,974,108** Jennings Exhibit No. 2		**$ 39,413,260**	

	Incremental cost category	Incremental Cost - Retail	Percent of Total Incremental Cost
14	[redacted]		
15			
16	**Total**	(1) **$ 39,413,260**	**100.00%**

Allocate estimated incremental cost of solar resources between solar compliance requirement and general compliance requirement:

17	[redacted]
18	
19	
20	
21	
22	

Calculate set-aside and other incremental and research cost per customer class - EMF Period:

Line No.	Customer Class	Number of REPS Accounts [1]	Annual Rider Cap per Account Type	Calculated Annual Revenue Cap	Cost Cap Allocation Factor	Allocated Annual Set-aside, Other Incremental, and Research Cost
1	Residential	1,242,493	$ 27	$ 33,547,311	51.3%	$ 10,645,530
2	General	200,086	$ 150	$ 30,012,900	45.9%	$ 9,524,949
3	Industrial	1,789	$ 1,000	$ 1,789,000	2.8%	$ 581,043
4	Totals			$ 65,349,211	100.0%	$ 20,751,522

Williams Ex No. 1, Pg 1 Line 12

Calculate general cost per customer class - EMF Period:

Line No.	Customer Class	Number of RECs for General compliance [a]	% of EE REC supplied by Class[2]	REC Requirement supplied by EE by class [3] [b]	Number of General RECs net of EE (c) = (a) - (b)	General Cost Allocation Factor (e) = (c) / (d)	Allocated Annual General Incremental Costs
5	Residential	[redacted]	60.2%	[redacted]		46.1%	$ 8,768,375
6	General		38.3%			50.3%	$ 9,577,928
7	Industrial		1.5%			3.6%	$ 677,394
8	Totals		100.0%		(d)	100.0%	$ 19,023,697

Williams Ex No. 1, Pg 1 Line 13

Total cost allocation by customer class - EMF Period:

		Total Incremental REPS cost by class	% Incremental REPS cost by class
9	Residential	$ 19,413,905	48.81%
10	General	$ 19,102,877	48.03%
11	Industrial	$ 1,258,437	3.16%
12	**Total**	**$ 39,775,219**	100.00%

Williams Ex. No. 1 Pg 1 Line No. 14

Notes:

(1) Average monthly number of REPS accounts for the EMF Period.

(2) EE allocated to account type according to actual relative contribution of EE RECs by customer class.

(3) Limited to 25% of total RECs

[redacted]

Calculate incremental cost under/(over) collection per customer class - EMF Period:

Line No.	Account Type	Allocated Annual Set-aside and Other Incremental costs	Allocated Annual General Incremental Costs	Total Incremental Costs	Actual NC Retail REPS Revenues Realized - EMF Period	Annual REPS EMF - Under/(Over)-Collection, before Interest	Interest on Over-collection[1]	Annual REPS EMF - Under/(Over)-Collection
1	Residential	$ 10,645,530	$ 8,768,375	$ 19,413,905	$ 19,358,519	$ 55,386	$ -	$ 55,386
2	General	$ 9,524,949	$ 9,577,928	$ 19,102,877	$ 20,601,947	$ (1,499,070)	$ (249,845)	$ (1,748,915)
3	Industrial	$ 581,043	$ 677,394	$ 1,258,437	$ 1,377,861	$ (119,424)	$ (19,904)	$ (139,328)
4	**Total**	**$ 20,751,522**	**$ 19,023,697**	**$ 39,775,219**	**$ 41,338,327**	**$ (1,563,108)**	**$ (269,749)**	**$ (1,832,857)**

<<<Williams Exhibit No. 2 page 1>>>

Notes:

[1] Interest calculated at annual rate of 10% for number months from mid-point of EMF period to mid-point of prospective rider billing period.

REDACTED VERSION

DUKE ENERGY PROGRESS, LLC
Docket No. E-2, Sub 1251
Compliance Cost for the Billing Period December 1, 2020 to November 30, 2021

Williams Exhibit No. 3
Page 1 of 2
June 9, 2020

Calculate set-aside and other incremental and research cost per customer class - Billing Period:

Line No.	Customer Class	Number of REPS Accounts [1]	Annual Rider Cap per Account Type	Calculated Annual Revenue Cap	Cost Cap Allocation Factor	Allocated Annual Set-aside, Other Incremental, and Research Cost
1	Residential	1,267,143	$ 27	$ 34,212,861	51.6%	$ 12,835,278
2	General	201,705	$ 150	$ 30,255,750	45.7%	$ 11,350,730
3	Industrial	1,773	$ 1,000	$ 1,773,000	2.7%	$ 665,158
4	Totals			$ 66,241,611	100.0%	$ 24,851,166

Williams Ex No. 1, Pg 2 Line 14

Calculate general cost per customer class - Billing Period:

Line No.	Customer Class	Number of RECs for General compliance [a]	% of EE REC supplied by Class[2]	REC Requirement supplied by EE by class [3] [b]	Number of General RECs net of EE (c) = (a) - (b)	General Cost Allocation Factor (e) = (c) / (d)	Allocated Annual General Incremental Costs
5	Residential	[redacted]	60.2%	[redacted]		46.4%	$ 6,761,690
6	General		38.3%			50.2%	$ 7,306,154
7	Industrial		1.5%			3.4%	$ 494,250
8	Totals		100.0%			100.0%	$ 14,562,094

Williams Ex No. 1, Pg 2 Line 15

Total cost allocation by customer class - Billing Period:

		Total Incremental REPS cost by class	% Incremental REPS cost by class
9	Residential	$ 19,596,968	49.72%
10	General	$ 18,656,884	47.34%
11	Industrial	$ 1,159,408	2.94%
12	**Total**	**$ 39,413,260**	100.00%

Williams Ex No. 1, Pg 2 Line 16

Notes:

(1) Projected average monthly number of REPS accounts for the Billing Period.
(2) EE allocated to account type according to actual relative contribution of EE RECs by customer class.
(3) Limited to 25% of total RECs

[redacted]

Calculate Total cost to collect by Customer Class - Billing Period:

North Carolina Retail Annual Rider Cost by Account Type

Line No.	North Carolina Retail Only - Billing Period	Allocated Annual Set-aside and Other Incremental costs	Allocated Annual General Incremental Costs	Total Incremental Costs
1	Residential	$ 12,835,278	$ 6,761,690	$ 19,596,968
2	General	$ 11,350,730	$ 7,306,154	$ 18,656,884
3	Industrial	$ 665,158	$ 494,250	$ 1,159,408
4	**Total**	**$ 24,851,166**	**$ 14,562,094**	**$ 39,413,260**
		Williams Exhibit No. 3, Pg 1, line 4	**Williams Exhibit No. 3, Pg 1, line 8**	**Williams Exhibit No. 3, Pg 1, line 12**

Calculate DEP NC Retail monthly REPS rider components:

Line No.	Customer Class	Total Projected Number of Accounts - DEP NC Retail[(1)]	Annual REPS EMF Under/(Over)-Collection	Receipts for Contract Amendments, Penalties, Change-of-	Total EMF costs/(credits)	Monthly EMF Rider	Projected Total Billing Period Incremental Costs	Monthly REPS Rider
1	Residential	1,267,143	$ 55,386	$ (48,478)	$ 6,908	**$ 0.00**	$ 19,596,968	**$ 1.29**
2	General	201,705	$ (1,748,915)	$ (43,376)	$ (1,792,291)	**$ (0.74)**	$ 18,656,884	**$ 7.71**
3	Industrial	1,773	$ (139,328)	$ (2,646)	$ (141,974)	**$ (6.67)**	$ 1,159,408	**$ 54.49**
4			**$ (1,832,857)**	**$ (94,500)**	**$ (1,927,357)**		**$ 39,413,260**	
			Williams Ex. No. 2, Pg 2				**Williams Ex. No. 3, Pg 2**	

Compare total annual REPS charges per account to per-account cost caps:

	Customer Class	Monthly EMF Rider	Monthly REPS Rider - 12 months	Combined Monthly Rider - 12 months	Regulatory Fee Multiplier	Monthly EMF Rider including Regulatory Fee	Monthly REPS Rider including Regulatory Fee	Combined Monthly Rider including Regulatory Fee	Combined Annual Rider including Regulatory Fee	Annual Per-Account Cost Cap
5	Residential	$ 0.00	$ 1.29	$ 1.29	1.001302	$ -	$ 1.29	$ 1.29	$ 15.48	$ 27.00
6	General	$ (0.74)	$ 7.71	$ 6.97	1.001302	$ (0.74)	$ 7.72	$ 6.98	$ 83.76	$ 150.00
7	Industrial	$ (6.67)	$ 54.49	$ 47.82	1.001302	$ (6.68)	$ 54.56	$ 47.88	$ 574.56	$ 1,000.00

Notes:

(1) Projected average monthly number of REPS accounts for the Billing Period.

(2) Forward EMF Period receipts for contract amendments, penalties, change-of-control, etc

Customer Class	Contract receipts credited by customer class - Jennings Exhibit No. 2	Allocation to customer class - Williams Exhibit No. 2, Pg 1	Receipts for contract amendments, penalties, change-of-control, etc.
Residential		51.30%	$ (48,478)
General		45.90%	$ (43,376)
Industrial		2.80%	$ (2,646)
Total contract payments received - EMF Period	$ (94,500)	100.00%	$ (94,500)
	Jennings Exhibit No. 2		

Worksheet detailing energy efficiency certificate ("EEC") inventory

	EECs	Reference
EECs carried forward at Dec 31, 2013	452,318	2013 Compliance Report - Docket No. E-2, Sub 1043
EECs generated for 2014 per Company's annual update	479,942	Company workpapers
Less: EECs used for compliance for 2014	276,649	2014 Compliance Report - Docket No. E-2, Sub 1071
EECs carried forward at Dec 31, 2014	655,611	2014 Compliance Report - Docket No. E-2, Sub 1071
EECs generated for 2015 per Company's annual update	1,682,467	Company workpapers
EEC inventory balance adjustment to recognize perpetual savings	1,966,773	Company workpapers
EEC inventory balance 2015 adjustment for EM&V results	4,506	Company workpapers
Less: EECs used for compliance for 2015	562,361	2015 Compliance Report - Docket No. E-2, Sub 1109
EECs carried forward at Dec 31, 2015	3,746,996	2015 Compliance Report - Docket No. E-2, Sub 1109
EECs generated for 2016 per Company's annual update	1,854,388	Company workpapers
EEC inventory balance adjustment - conversion to measure life	(123,943)	Company workpapers
EEC inventory balance 2016 adjustment for EM&V results	(83,074)	Company workpapers
Less: EECs used for compliance for 2016	561,829	2016 Compliance Report - Docket No. E-2, Sub 1144
EECs carried forward at Dec 31, 2016	4,832,538	2016 Compliance Report - Docket No. E-2, Sub 1144
EECs generated for 2017 per Company's annual update	2,026,234	Company workpapers
EEC inventory balance 2017 adjustment for EM&V results	(61,225)	Company workpapers
Less: EECs used for compliance for 2017	559,087	2017 Compliance Report - Docket No. E-2, Sub 1175
EECs carried forward at Dec 31, 2017	6,238,460	2017 Compliance Report - Docket No. E-2, Sub 1175
EECs generated for 2018 per Company's annual update	2,182,561	Company workpapers
EEC inventory balance 2018 adjustment for EM&V results	2,467	Company workpapers
Less: EECs used for compliance for 2018	920,747	2018 Compliance Report - Docket No. E-2, Sub 1205
EECs carried forward at Dec 31, 2018	7,502,741	2018 Compliance Report - Docket No. E-2, Sub 1205
EECs generated for 2019 per Company's annual update	2,257,396	Company workpapers [(a)]
EEC inventory balance 2019 adjustment for EM&V results	21,274	Company workpapers
Less: EECs used for compliance for 2019	967,181	2019 Compliance Report - Docket No. E-2, Sub 1251
EECs carried forward at Dec 31, 2019	8,814,231	2019 Compliance Report - Docket No. E-2, Sub 1251

Worksheet detailing energy efficiency certificate ("EEC") inventory
Summary workpapers - EECs generated

	Program year							
Update for EECs generated - as of year-end 2019:	**2008-2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**Total**
Current view at year-end 2019	2,157,484	1,219,361	1,533,015	1,817,503	2,028,060	2,203,836	2,257,396	13,216,654
Previously reported current view at year-end 2018	2,157,484	1,219,361	1,533,015	1,817,503	2,028,060	2,182,561	[(a)]	10,937,984
Total Adjustments to previously reported results	0	0	0	0	0	21,274		2,278,671
EM&V and participation adjustments (detail below)	0	0	0	0	0	21,274		21,274
EECs generated 2019 per current view							[(a)]	2,257,396
EECs entered in NC-RETS for vintage 2019								**2,278,671**

Detail for adjustments applicable to 2008 - 2018 results:

		Program year						
Adjustment type	Program	**2008-2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**Total**
EM&V and participation adjustments:								
EM&V	Residential - My Home Energy Report	-	-	-	-	-	21,151	21,151
EM&V	Residential - Neighborhood Energy Saver	-	-	-	-	-	188	188
Participation	Non-Residential Smart Saver	-	-	-	-	-	(65)	(65)
Total Adjustments to previously reported results		**-**	**-**	**-**	**-**	**-**	**21,274**	**21,274**

EM&V reports applicable to results reported above and the time period covered in this docket - filed as Exhibit No. 8 to the testimony of DEP witness Robert Evans in DEP's energy efficiency Docket No. E-2, Sub 1252:

Program Name As Filed	**Docket**	**Report Reference**	**Effective Date**
Neighborhood Energy Saver Program	E-2, Sub 952	Duke Energy Carolinas and Duke Energy Progress 2017 Neighborhood Energy Saver Program Evaluation Report - Final	7/1/2018
My Home Energy Report Program	E-2, Sub 989	My Home Energy Report Program Evaluation	6/1/2018
Save Energy and Water Kits Program	E-2, Sub 1085	Save Energy and Water Kits 2018 - 2019 Evaluation Report	9/1/2019