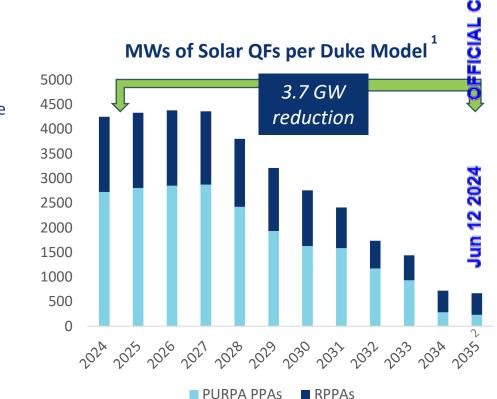


Accounting for existing solar capacity

QFs are crucial for carbon neutrality by 2050

- 4.2 GW of solar QFs are contracted under PURPA and RPPAs today, generally under 10-15 year terms¹
- A number of these sites will be expiring within the next decade. Per the CPIRP it is assumed such QFs are replaced "like-kind" once the current contracts roll off
 - These sites generally have the option to recontract under a 5 year avoided cost rate at the time of PPA expiry
- In data provided by Duke to CCEBA, there appear to be a significant amount of these resources rolling off starting in 2028
- Given the existing interconnections of these sites, such QFs may present an opportunity to further carbon reduction while avoiding the issue of annual interconnection limitations identified by Duke



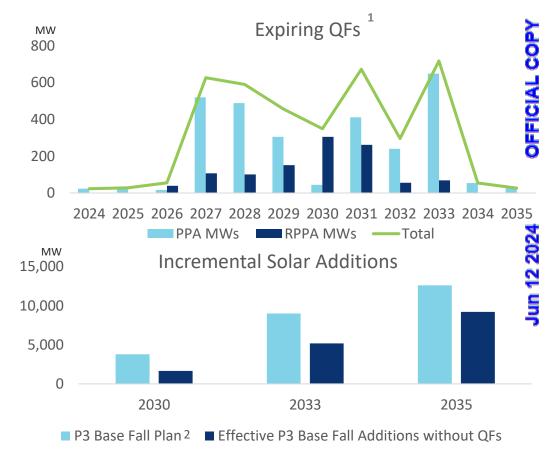
- Duke Response to CCEBA Data Request CCEBA Request No. 2-I(b)
- 2. Year of Duke 70% carbon reduction target under P3



QF Optimization and Opportunities

A stakeholder process can ensure QFs are utilized to the fullest of their potential

- Failing to consider existing QFs in the Carbon Plan effectively reduces incremental solar additions due to limitations on interconnection capability
- While further discussion and stakeholder analysis is necessary, initial diligence includes the following opportunities could benefit both developers and rate payers
 - developing a process to allow these existing QFs to renew their PPAs for longer terms (including a potential Blend and Extend 2.0)
 - maximizing production through upgrades and the addition of storage on existing interconnections.
- CCEBA recommends the Commission consider a directive to determine what, if any, economic incentives may exist for optimizing existing solar QFs



- . Duke Response to CCEBA Data Request CCEBA Request No. 2-I(b)
- Duke 2024 Carbon Plan and IRP



