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JUN 16 2021

June 16, 2021

VIA Electronic Filing

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

*Re: Motion for Leave to File Supplemental Reply Comments
Docket No. E-100, Sub 165*

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceeding on behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC is their Motion for Leave to File Supplemental Reply Comments.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kjg

Enclosure

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
2020 Biennial Integrated Resource Plans and) DUKE ENERGY CAROLINAS, LLC
Related 2020 REPS Compliance Plans) AND DUKE ENERGY PROGRESS,
) LLC MOTION FOR LEAVE TO FILE
) SUPPLEMENTAL REPLY
) COMMENTS

NOW COMES Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, the “Companies”) and hereby respectfully request that the North Carolina Utilities Commission (the “Commission”) grant them leave to file supplemental reply comments on or before July 1, 2021, in response to the second corrected version of the *Report of Synapse Energy Economics, Inc.* (the “Second Corrected Synapse Report”) filed by the North Carolina Sustainable Energy Association (“NCSEA”), the Carolinas Clean Energy Business Association (“CCEBA”), the Southern Alliance for Clean Energy (“SACE”), the Sierra Club, and the Natural Resources Defense Council (“NRDC” and, together with NCSEA, CCEBA, SACE, and Sierra Club, the “Joint Synapse Sponsors”). In support of the Motion, the Companies show as follows:

1. The Joint Synapse Sponsors filed the original Synapse Report, dated February 26, 2021, as Exhibit A to the *Partial Initial Comments of NCSEA, CCEBA, and SACE, et al.* filed on March 1, 2021.
2. On March 22, 2021, the Joint Synapse Sponsors filed the First Corrected Synapse Report, dated March 19, 2021, to correct an error identified in the Reasonable

Assumptions portfolio with respect to the modeling of solar plus storage projects within the EnCompass model.

3. On May 4, 2021, during the 2021 South Carolina evidentiary hearing on the 2020 IRPs, the Companies pointed out three significant errors in the Synapse Report. The sponsoring Synapse witness, Ms. Rachel Wilson, testified that corrections to the Synapse Report were needed during cross-examination.

4. On May 27, 2021, the Joint Synapse Sponsors filed the Second Corrected Synapse Report to correct certain errors, as determined by Synapse.

5. The Companies did not receive the Second Corrected Synapse Report until served by counsel for the Joint Synapse Sponsors after 4:00 p.m. on the day before the Companies' reply comments were due. Consequently, the Companies' Reply Comments, filed on May 28, 2021, addressed the analysis and issues raised in the First Corrected Synapse Report and reserved their right to file comments in response to the Second Corrected Synapse Report after a reasonable period of time to allow for review and additional discovery as warranted.

6. On May 28, 2021, the Companies, along with the Public Staff, the Attorney General's Office, NCSEA/CCEBA, Tech Customers, NC WARN/Center for Biological Diversity, CIGFUR, and Dominion Energy North Carolina filed reply comments. Despite the proximity to the May 28, 2021 reply comments deadline, several intervenors relied upon, adopted, or otherwise analyzed the Second Corrected Synapse Report in their reply comments.

7. On June 2, 2021, just two business days after the filing of reply comments, the Companies issued discovery to the Joint Synapse Sponsors seeking further information

regarding the inputs, assumptions, and modeling used to develop the Second Corrected Synapse Report.

8. The Joint Synapse Sponsors provided responses, including the data and inputs requested, on June 11, 2021.

9. The Companies are currently working diligently to evaluate the Second Corrected Synapse Report and plan to seek follow-up discovery, as needed, on or before June 18, 2021.

10. The Companies submit that they will be prejudiced without a fair opportunity to respond to the Second Corrected Synapse Report, and that the Commission will be prejudiced in that it will be forced to evaluate the alternative resource plan proposed by the Second Corrected Synapse Report without the benefit of any vetting process.

11. The undersigned counsel has contacted counsel for all parties of record regarding this motion via electronic mail, and no counsel for any party who has responded has indicated any objection to the Companies' motion.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission grant their motion and allow them to file supplemental reply comments on or before July 1, 2021, responding to the Second Corrected Synapse Report, including responding to reply comments relying upon or proposing the Commission adopt the Second Corrected Synapse Report.

Respectfully submitted, this the 16th day of June, 2021.

/s/E. Brett Breitschwerdt

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*Counsel for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Leave to File Supplemental Reply Comments, as filed in Docket No. E-100, Sub 165, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 16th day of June, 2021.

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