

June 15, 2022

Via Electronic Filing

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Re: Docket No. E-2, Sub 1297; Docket No. E-7, Sub 1268
Duke Energy Progress, LLC and Duke Energy Carolinas, LLC – 2022 Solar Procurement
**CIGFUR's Letter Opposing Motion for Limited Reconsideration and Supporting
Response of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC**

Dear Ms. Dunston:

Pursuant to the Commission's June 14, 2022 *Order Establishing Procedures for Motion for Reconsideration and Staying Issuance of Request for Proposals and Pro Forma Power Purchase Agreement*, the Carolina Industrial Group for Fair Utility Rates II and III (together, "CIGFUR") respectfully submits this letter in lieu of a responsive pleading opposing the motion for limited reconsideration ("Motion") filed by the Clean Power Suppliers Association and the Carolinas Clean Energy Business Association (together, "Utility-Scale Solar Advocates").

CIGFUR opposes the Motion filed by Utility-Scale Solar Advocates because (1) the Biden Administration's Emergency Declaration ("Emergency Declaration") imposing a moratorium on new solar module tariffs until at least 2024 does, in fact, significantly decrease market pressures and uncertainty for renewable developers in the utility-scale solar industry; (2) the impact of the Emergency Declaration was accurately represented in comments filed by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (together, "Duke") and likewise, the Commission properly evaluated and weighed the Emergency Declaration in its June 9, 2022 *Order Approving Request for Proposals and Pro Forma Power Purchase Agreement Subject to Amendments*; (3) the more appropriate solution to the issue raised by Utility-Scale Solar Advocates is for market participants to factor in to bid prices a hedge against future market risks and uncertainty, rather than to allow for a two-way bid refresh mechanism; and (4) Utility-Scale Solar Advocates' proposed two-way bid refresh mechanism unduly shifts risk and costs to the utility's customers, whereas the one-way downward bid refresh option provides more stability and protection for ratepayers. For all these reasons, CIGFUR takes the position that the Utility-Scale Solar Advocates' Motion has provided neither sufficient, nor compelling evidence to justify reconsideration by the Commission and should, therefore, be denied.

CIGFUR had a chance to review Duke's Response to Utility-Scale Solar Advocates' Motion in advance of filing. CIGFUR agrees with and supports the positions taken by Duke therein.

Please contact me directly at (919) 607-6055 should you have any questions about this filing.

With best wishes, I am

Very truly yours,

Electronically submitted

/s/ Christina D. Cress
Counsel for CIGFUR
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cc: Parties of Record

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she caused the foregoing **CIGFUR's Letter Opposing Motion for Limited Reconsideration and Supporting Response of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC** to be served upon counsel of record for all parties to this proceeding by electronic mail.

This the 15th day of June, 2022.

/s/ Christina D. Cress
Christina D. Cress

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