

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 927
DOCKET NO. E-2, SUB 1287
DOCKET NO. E-7, SUB 1032
DOCKET NO. E-7, SUB 1261

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 927

In the Matter of)
Petition by Duke Energy Progress, LLC, for)
Approval of Modifications to Residential)
Service Load Control Rider)

DOCKET NO. E-2, SUB 1287

In the Matter of)
Application of Duke Energy Carolinas, LLC,)
for Approval of PowerPairSM Solar and)
Battery Installation Pilot Program Pursuant)
to Order of the North Carolina Utilities)
Commission)

DOCKET NO. E-7, SUB 1032

In the Matter of)
Petition by Duke Energy Carolinas, LLC,)
for Approval of Modifications to Residential)
Service Load Control Rider)

DOCKET NO. E-7, SUB 1261

In the Matter of)
Application of Duke Energy Carolinas, LLC,)
for Approval of PowerPairSM Solar and)
Battery Installation Pilot Program Pursuant)
to Order of the North Carolina Utilities)
Commission)

**PUBLIC STAFF'S MOTION
FOR LEAVE TO FILE
CORRECTED INITIAL
COMMENTS**

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Commission), by and through its Executive Director, Christopher J. Ayers, and respectfully requests the Commission for leave pursuant to Commission Rule R1-5(f) to file a corrected version of its initial comments that were filed in the above-captioned dockets on August 21, 2023 (Motion). In support of this Motion, the Public Staff shows as follows:

1. On August 21, 2023, the Public Staff filed its Initial Comments in response to the applications of Duke Energy Carolinas, LLC (DEC), and Duke Energy Progress, LLC (DEP and, together with DEC, Duke or the Companies), for approval of the Companies' solar and battery installation program entitled "PowerPairSM Solar and Battery Installation Pilot Program" in Docket Nos. E-2, Sub 1287, and E-7, Sub 1261 (PowerPair) and the Companies' corresponding requests to modify the Companies' residential load control riders in Docket Nos. E-2, Sub 927 (EnergyWise), and E-7, Sub 1032 (Power Manager and, together with EnergyWise, the Demand-Side Management (DSM) Program Modifications) pursuant to Commission Rule R8-68.

2. The Attorney General's Office also filed initial comments, as did the Southern Alliance for Clean Energy and Vote Solar (together) and the Solar Energy Industries Association.

3. In its initial comments, the Public Staff compared the proposed upfront incentives under the PowerPair pilot to the Lawrence Berkeley National Laboratory's (LNBL) estimated costs of new solar and storage installations,

concluding that the upfront incentives proposed by Duke would cover approximately 10% of the total solar system cost (Initial Comments at 15), 21% of the energy storage cost (Initial Comments at 16), and 13% of the total estimated system cost (Initial Comments at 18).¹

4. After its Initial Comments were filed, the Public Staff discovered an error in its calculation of estimated solar system costs from LBNL Report. In addition, the Public Staff received new information as to how LBNL derived the estimated cost of installed solar in North Carolina was calculated. It appears that the North Carolina solar cost estimates contained in the LBNL Report are based on Reports of Proposed Construction that were filed in 2021. This new information has led the Public Staff to believe that the LBNL Report may not provide the most accurate figures for the estimated cost of solar installations for prospective customers.

5. The Public Staff believes that for customers considering solar and storage installations, the most accurate data would reflect actual quotes from installers. To that end, the Public Staff has revised its estimates of solar and energy storage installations to reflect data from EnergySage, a widely used platform that estimates costs based on its online marketplace. EnergySage's marketplace data is used by Bloomberg New Energy Finance, a well-known source for new energy

¹ The LBNL's estimated costs of new solar and storage installations are contained in its report entitled *Tracking the Sun – Pricing and Design Trends for Distributed Photovoltaic Systems in the United States – 2022 Edition*. LBNL (September 2022). This report is accessible at: <https://emp.lbl.gov/tracking-the-sun>.

statistics, and the LBNL Report contains a comparison of its estimated prices to EnergySage data.²

6. The Public Staff's Corrected Initial Comments therefore corrects the estimated system costs, and makes minor corrections on pages 15, 16, 18, 19, and 20. Clean and redlined copies of the Public Staff's Corrected Initial Comments has been filed contemporaneously with this Motion.

7. While the Corrected Initial Comments submitted herein reflect the use of EnergySage data, rather than data from the LBNL Report, the Public Staff's recommendations regarding the PowerPair pilot and the DSM Program Modifications are not impacted. Rather, this correction is simply to provide the Commission with a more accurate solar and storage system cost estimate.

THEREFORE, the Public Staff moves that the Commission grant the Public Staff's Motion.

² See the LBNL Report at 31-32.

Respectfully submitted this the 25th day of August, 2023.

PUBLIC STAFF
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Electronically submitted
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CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 25th day of August, 2023.

Electronically submitted
/s/ Anne M. Keyworth