

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1190
DOCKET NO. E-7, SUB 1185
DOCKET NO. E-100, SUB 90

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1190)	
)	
In the Matter of)	
Request of Duke Energy Progress, LLC, for)	
Approval of Renewable Advantage Rider)	
(NC))	
)	
DOCKET NO. E-7, SUB 1185)	MOTION TO SUSPEND
)	TARIFFS AND REQUEST
In the Matter of)	COMMENTS
Request of Duke Energy Carolinas, LLC,)	
for Approval of Renewable Advantage)	
Rider (NC))	
)	
DOCKET NO. E-100, SUB 90)	
)	
In the Matter of)	
NC GreenPower)	

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and requests that the Commission suspend the Renewable Advantage Riders (NC) and the proposed revisions to the NC GreenPower (NC) Program tariffs as filed by Duke Energy Progress, LLC (DEP), and Duke Energy Carolinas, LLC (DEC), on November 20, 2018, and establish a comment cycle for initial and reply comments on these filings. In support of this motion, the Public Staff respectfully shows the Commission:

1. On November 20, 2018, DEP and DEC individually filed proposed Renewable Advantage Riders, as well as revisions to the existing NC GreenPower Program (NC).

2. Under the riders, residential and non-residential (small business) customers would be able to choose to purchase renewable energy credits (RECs) to offset all or a portion of their electrical consumption. DEP and DEC request to offer the riders as pilots available through December 31, 2024.

3. DEP and DEC are also requesting changes to their NC GreenPower Program (NC) tariffs to reflect NC GreenPower's decision to seek revisions to its mass market program, whereby it would no longer acquire RECs, but use all funds to install solar generation at schools throughout North Carolina.

4. The Public Staff, DEP, and DEC have engaged in discussions regarding the proposed riders, including whether the renewable Advantage Riders should be offered as a regulated or unregulated offering. The Public Staff submits that allowing parties to file comments on the proposed Renewable Advantage tariffs and the revisions to the NC GreenPower Program tariffs would assist the Commission in ruling on DEP and DEC's request for approval of the new and revised tariffs.

5. To allow adequate time for parties to submit comments, the Public Staff requests that the Renewable Advantage tariffs and the revisions to the NC GreenPower Program tariffs be suspended for up to 270 days pursuant to N.C. Gen. Stat. § 62-134, and that initial comments be submitted within 15 business days from the date of the Commission's order establishing a comment cycle, with

reply comments submitted within 10 business days of the submission date for initial comments. To assist the Commission, the Public Staff proposes that each party submitting comments attach a proposed order reflecting its position.

6. The Public Staff has been authorized by DEP and DEC to state that they do not oppose this motion.

Therefore, the Public Staff prays that the Commission issue an order suspending the Renewable Advantage tariffs and the revisions to the NC GreenPower Program tariffs; requesting initial comments within 15 business days of the Commission's order and reply comments within 10 days of the submission date for initial comments; requesting that proposed orders be attached to all comments submitted; and granting such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 30th day of November, 2018.

PUBLIC STAFF
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Executive Director

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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 30th day of November, 2018.

Electronically submitted
/s/ Lucy Edmondson