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March 14, 2024

VIA ELECTRONIC FILING

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

**RE: Duke Energy Carolinas, LLC's Application for a Certificate of Public Convenience and Necessity to Construct an 850 MW Natural Gas-Fired Combustion Turbine Electric Generating Facility in Catawba County, North Carolina
Docket No. E-7, Sub 1297**

Dear Ms. Dunston:

Enclosed for filing with the North Carolina Utilities Commission ("Commission") in the above-referenced proceeding is Duke Energy Carolinas, LLC's ("DEC" or the "Company") Application for a Certificate of Public Convenience and Necessity to Construct an 850 MW Natural Gas-Fired Combustion Turbine Electric Generating Facility in Catawba County, North Carolina ("Application"). The Company is filing the Application pursuant to N.C.G.S. § 62-110.1 and Commission Rule R8-61 to construct two hydrogen capable, advanced-class combustion turbine ("CT") units at the site of its existing Marshall Steam Station in Catawba County, North Carolina ("Marshall Energy Complex"). Pursuant to N.C.G.S. § 62-300(a)(5), DEC has electronically submitted to the Clerk's Office a \$250 filing fee to process this Application.

The Company and Duke Energy Progress, LLC ("DEP") (collectively, the "Companies") filed their initial 2023-2024 Carbon Plan and Integrated Resource Plan ("CPIRP" or the "Plan"), with the Commission on August 17, 2023, in Docket No. E-100, Sub 190, and recently submitted Supplemental Planning Analysis ("SPA") in support of the CPIRP in the same docket on January 31, 2024. Through the CPIRP, the Companies have identified construction of the planned Marshall Energy Complex CTs as needed and part of the Companies' least cost path to enabling the continued orderly retirement of the Companies' remaining North Carolina coal-fired generation and necessary to achieve the carbon emission reduction requirements of N.C.G.S. § 62-110.9, while maintaining or improving upon the adequacy and reliability of the existing grid. As part of the Companies'

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proposed Execution Plan set forth in Chapter 4 of the CPIRP, as updated in Section 4 of the SPA, the Companies plan to place the new CTs into service by January 1, 2029, to support the orderly retirement of the Marshall Steam Station's coal-fired Units 1 and 2. The need for new dispatchable gas generation to enable these coal unit retirements and reliably progress the energy transition is also consistent with the Commission's findings and adoption of initial reasonable steps to execute the Commission's initial Carbon Plan, as approved in its December 30, 2022, *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning*, issued in Docket No. E-100, Sub 179.

The confidential redacted portions of this filing contain commercially sensitive information that should be protected from public disclosure. The information designated herein as confidential qualifies as "trade secrets" under N.C.G.S. § 66-152(3). If this information were to be publicly disclosed, it would allow competitors, vendors, and other market participants to gain an undue advantage, which may ultimately result in harm and higher cost to DEC's customers. Pursuant to N.C.G.S. § 132-1.2, DEC requests that information marked "Confidential" be protected from public disclosure. The Company is contemporaneously filing with the Commission all information designated as confidential under seal and will make the information available to other parties to this docket pursuant to an appropriate nondisclosure agreement.

Please feel free to contact me should you have any questions. Thank you for your assistance in this matter.

Sincerely,



Jason A. Higginbotham

Enclosure

cc: Parties of Record

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