

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1318
DOCKET NO. EC-67, SUB 55

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| | | |
|--|---|----------------------------------|
| In the Matter of: |) | |
| Joint Application of Duke Energy |) | |
| Progress, LLC and North Carolina |) | |
| Electric Membership Corporation for a |) | |
| Certificate of Public Convenience and |) | JOINT APPLICATION FOR A |
| Necessity to Construct a 1,360 MW |) | CERTIFICATE OF PUBLIC |
| Natural Gas-Fueled Combined Cycle |) | CONVENIENCE AND NECESSITY |
| Electric Generating Facility in Person |) | |
| County, North Carolina |) | |

Pursuant to N.C.G.S. §§ 62-82, 62-110.1, the North Carolina Utilities Commission’s (“Commission”) Rule R8-61(b), as well as the Commission’s *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning*, issued in Docket No. E-100, Sub 179 pursuant to N.C.G.S. § 62-110.9 on December 30, 2022 (“Carbon Plan Order”), Duke Energy Progress, LLC (“DEP” or the “Company”) and North Carolina Electric Membership Corporation (“NCEMC” and together with DEP, the “Joint Applicants”) hereby jointly submit this Application for a Certificate of Public Convenience and Necessity (“Application”) to construct and operate an advanced-class, approximately 1,360 megawatt (“MW”) combined cycle gas turbine (“CC”) facility for the generation of electricity at the site of its existing Roxboro Plant (“Roxboro”) in Person County, North Carolina (the “Proposed Facility”). DEP will operate the Proposed Facility and own approximately 1,135 MW of its capacity with NCEMC owning the remaining approximately 225 MW.

Constructing the Proposed Facility at Roxboro is supported by the Commission’s Carbon Plan Order and DEP’s and Duke Energy Carolinas, LLC’s (“DEC” and, together with DEP, the “Companies”) 2023-2024 Carbon Plan and Integrated Resource Plan (“CPIRP”). More specifically, the Proposed Facility is identified in the Companies’ CPIRP Execution Plan as a crucial component of the Companies’ executable plan to meet projected customer load growth in the Carolinas and foundational to the Companies’ least cost energy transition strategy to reliably add new generation to the Companies’ combined systems while enabling the orderly retirement of aging, coal-fired generating facilities. The Company currently plans to place the Proposed Facility into service by January 1, 2029, which will enable DEP to permanently retire Roxboro’s coal-fired Units 1 and 4. The Proposed Facility and the remaining Roxboro coal-fired Units 2 and 3, which will continue to operate until 2034, will collectively be known as the Person County Energy Complex.

This Application is supported by the testimonies of Company witnesses Michael Quinto, Director of IRP Advanced Analytics; Daniel Donochod, General Manager of Generation Execution and Technologies; H. Lee Mitchell, IV, Director of Fuel Strategy and Planning; and John Robert Smith, Jr. (Bobby), General Manager for New Gas Generation Development; as well as NCEMC witness Amadou Fall. This Application is also supported by the following exhibits¹:

¹ The Application was primarily developed by DEP and the supporting Exhibits hereto are sponsored by DEP, as majority owner responsible for operating the Proposed Facility. As described by NCEMC witness Fall, NCEMC exercised a contractual option under its wholesale power supply agreement on March 14, 2024, to own a portion of the Proposed Facility and NCEMC is now a Joint Applicant supporting its resource planning need for the Proposed Facility in support of Joint Applicants’ demonstration that the public convenience and necessity requires construction of the Proposed Facility. Certain statutory and regulatory provisions applicable to DEP’s operations as an electric public utility do not apply to NCEMC, which is not an electric public utility and is not subject to the ratemaking authority of the Commission.

- **Exhibit 1A** – (1) the Carbon Plan Order; and (2) the Companies’ 2023-2024 CPIRP, including the initial Plan filed with the Commission on August 17, 2023, in Docket No. E-100, Sub 190, and the Supplemental Planning Analysis (“SPA”) filed with the Commission in the same docket on January 31, 2024.² The Carbon Plan Order and the CPIRP represent the Companies’ most current and proposed executable resource plan for the Carolinas. The CPIRP is on file with the Commission and DEP is incorporating these documents by reference—rather than reproducing them—given the size of the documents and their public availability through the Commission’s Document Management System.
- **Exhibit 1B – DEP Statement of Need to Construct the Proposed Facility** providing information responsive to Rule R8-61(b)(1);
- **Confidential Exhibit 2 – Siting and Permitting Information** providing updates to the information set forth in the Company’s preliminary plans filed on November 1, 2023, as well as additional discussion about the methodology underlying the studies and analysis presented in the preliminary plans, pursuant to Rule R8-61(b)(2);

² Commission Rule R8-61(b)(1)(i) and (ii) cross reference a utility’s most recent biennial report and most recent annual report filed pursuant to Commission Rule R8-60. However, the Commission recently promulgated Rule R8-60A, which sets forth the filing requirements applicable to the Companies’ biennial CPIRP filings and to which DEP will refer in this Application. Relatedly, the General Assembly’s recent enactment of Session Law 2023-138, on October 10, 2023, modifies N.C.G.S. § 62-110.1(e), establishing new requirements applicable to the Companies’ CPCN applications as well as impacting the filing requirements under Rule R8-61(b)(5) applicable to coal or nuclear CPCN applications. While DEP has attempted to adhere to and reconcile these new requirements with existing Rule R8-61 in preparing this Application, out of an abundance of caution, DEP respectfully requests waiver of any provisions of pre-existing Rule R8-61 that may no longer apply to the Companies’ operations as result of changes in law or regulations. It may also be appropriate to revise Commission Rule R8-61 in the future to reflect the Commission’s adoption of Rule R8-60A and the General Assembly’s recent enactment of N.C.G.S. § 62-110.9 and modifications to N.C.G.S. § 62-110.1(e).

- **Confidential Exhibit 3 – Cost Information** providing information responsive to Rule R8-61(b)(3); and
- **Confidential Exhibit 4 – Construction Information** providing information responsive to Rule R8-61(b)(4).

Witness Quinto is sponsoring Exhibits 1A and 1B, while witness Smith is sponsoring Exhibits 2, 3, and 4.

In support of this Application, the Joint Applicants respectfully submit the following:

GENERAL INFORMATION

1. DEP's general offices are located at 410 South Wilmington Street, Raleigh, North Carolina, 27602, and its mailing address is:

Duke Energy Progress, LLC
P.O. Box 1551
Raleigh, North Carolina 27602

2. DEP's attorneys, to whom all notice and other communications with respect to this Application should be sent, are:

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3. NCEMC's general offices are located at 3400 Sumner Boulevard, Raleigh, NC 27616, and its mailing address is:

North Carolina Electric Membership Corporation
3400 Sumner Boulevard
Raleigh, NC 27616

4. NCEMC's attorneys to whom all notice and other communications with respect to this Application should be sent, are:

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With a copy to:

Charles Bayless, Senior Vice President and General Counsel
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5. DEP is (1) a limited liability company duly organized and existing under the laws of the State of North Carolina; (2) duly authorized by its Articles of Organization to engage in the business of generating, transmitting, distributing, and selling electric power and energy; and (3) a public utility under the laws of the State of North Carolina, and its operations in this State are subject to the jurisdiction of this Commission; and (4) a public utility under the laws of the State of South Carolina, and its operations in South Carolina are subject to the jurisdiction of the Public Service Commission of South Carolina. DEP's service territory covers approximately 29,000 square miles, including a substantial portion of the coastal plain of North Carolina extending from the Piedmont to the Atlantic coast between the Pamlico River and the South Carolina border, the lower Piedmont section of North Carolina, an area in western North Carolina in and around the city of Asheville, and an area in the northeastern portion of South Carolina. DEP supplies retail electric service to approximately 1.5 million customers in North Carolina.

6. NCEMC is a generation and transmission cooperative organized pursuant to Chapter 117 of the North Carolina General Statutes and is responsible for the full or partial power supply of its 25 member distribution cooperatives throughout the State of North Carolina. Those 25 members, in turn, supply electricity to more than one million homes, farms, and businesses in which more than 2.5 million North Carolinians live and work.

7. In addition to generating its own power and energy, NCEMC and its members purchase power and energy, pursuant to wholesale contracts, from the Companies and others to supply its members in 93 counties in North Carolina. NCEMC and its member distribution cooperatives have over 300 wholesale power delivery points across the State and also take retail service from the Companies at multiple locations.

**DEP NEED FOR PROPOSED FACILITY TO SUPPORT CARBON PLAN
EXECUTION**

8. Consistent with N.C.G.S. § 62-110.1(e), the Commission should authorize construction of the Proposed Facility because it is “part of the least cost path to achieve compliance with the authorized carbon reduction goals in G.S. 62-110.9, will maintain or improve upon the adequacy and reliability of the existing grid,” and because construction and operation of the Proposed Facility is in the public interest.

9. In the Carbon Plan Order, the Commission recognized the importance of new gas CCs in the Companies’ plans to retire and replace the 8,400 MW of remaining coal-fired generation owned and operated by DEP and DEC in North Carolina and to maintain reliability during the Companies’ energy transition towards carbon neutrality by 2050.³ More specifically, the Commission gave “substantial weight” to the Companies’ testimony that new gas CC resources were essential to achieving the carbon reduction mandates set forth in N.C.G.S. § 62-110.9, while simultaneously maintaining or improving reliability and pursuing a least cost path.⁴ The Commission also noted that new natural gas

³ See Exhibit 1A Carbon Plan Order at 78 (“The Commission gives substantial weight to Duke’s testimony that Duke’s planned coal unit retirements require replacement resources that can provide firm, dispatchable, and equally reliable capacity like ... baseload CCs and that without such replacement resources, Duke cannot retire coal on an accelerated schedule.”).

⁴ Exhibit 1A Carbon Plan Order at 79 (“The Commission likewise gives substantial weight to Duke’s testimony that the limited new natural gas CC ... resources Duke identifies in the near-term action plan are

resources—including new CC resources that emit approximately 60% less carbon dioxide per megawatt-hour than the coal units they are replacing—are necessary for the Companies to achieve mandated carbon dioxide emissions reductions.⁵ The Commission gave “substantial weight” to testimony from the Public Staff – North Carolina Utilities Commission (“Public Staff”) that almost all proposed portfolios included new CC resources, and that if new natural gas resources were not an option, the Companies would need to consider delaying planned coal retirements.⁶ Ultimately, the Commission concluded that it was reasonable for the Companies to plan for approximately 1,200 MW of new CC generating resources.⁷

10. Since the Commission issued the Carbon Plan Order, the Companies’ need for new gas CC resources has only increased, driven by the changing energy landscape described throughout the Companies’ CIPRP.⁸ The increased need for dispatchable resources like CCs results primarily from projected customer load growth due, in large part, to the Carolinas’ recent significant economic development success, as well as the

essential to achieving the Interim Target, while maintaining or improving reliability, and doing so along a least cost path.”).

⁵ Exhibit 1A Carbon Plan Order at 79 (“Similarly persuasive was the Modeling and Near-Term Actions Panel’s testimony that failing to develop new natural gas resources jeopardizes Duke’s ability to achieve the mandated carbon dioxide emissions reduction, including witness Snider’s testimony that new CC capacity resources are approximately 60% less carbon dioxide emitting per MWh compared to the coal they are replacing.”).

⁶ Exhibit 1A Carbon Plan Order at 79 (“The Commission also gives substantial weight to Public Staff witness Thomas’ testimony that almost all the proposed portfolios include natural gas CC in the near-term, and that if new natural gas facilities are not an option, then Duke may need to consider delaying its planned coal retirements.”).

⁷ Exhibit 1A Carbon Plan Order at 79.

⁸ *See generally* Exhibit 1A CIPRP Executive Summary at 4-9; Exhibit 1A CIPRP Chapter 1; Supplemental Direct Testimony of Glen A. Snider on Behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Docket No. E-100, Sub 190 (Nov. 30, 2023); and Supplemental Direct Testimony of Glen Snider, Michael Quinto, Thomas Beatty, and Ben Passty on Behalf of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Docket No. E-100, Sub 190 at 4-9 (Jan. 31, 2024).

Companies' proposed increased planning reserve margin to ensure reliable system operations in the current changing energy landscape.

11. The CPIRP represents the Companies' most reasonable, least cost, and least risk plan to meet load growth while reliably retiring and replacing the 8,400 MW of coal generation operating in North Carolina today and to achieve the emission reduction objectives of N.C.G.S. § 62-110.9 over the base planning horizon, while simultaneously maintaining or improving existing grid reliability. As part of this executable resource plan for the Carolinas, the CPIRP's Near-Term Action Plan ("NTAP") identifies the need to place one CC facility (1,360 MW) into service by 2029. More specifically, the Companies' proposed CPIRP Execution Plan and proposed NTAP identifies the Companies' plans to construct the Proposed Facility at Roxboro to achieve commercial operation by January 1, 2029, to reliably meet system needs.⁹

12. Constructing the Proposed Facility will also enable DEP to economically retire Roxboro Units 1 and 4 consistent with the schedule supported in the CPIRP coal retirement analysis and to prudently manage increasing coal production, supply chain and commodity price risks by progressing coal unit retirements in an orderly manner that mitigates risk for DEP's customers.¹⁰ The changing economics of coal generation supports the planned retirement of Roxboro 1 and 4 and replacement with the Proposed Facility given the economics and environmental regulations driving an ongoing decline in the coal

⁹ Exhibit 1A CPIRP Chapter 4 at 10 (Table 4-2); Exhibit 1A Supplemental Planning Analysis Section 4 at 48 (Table SPA 4-1).

¹⁰ See generally Exhibit 1A CPIRP Appendix F; Exhibit 1A Supplemental Planning Analysis Section 3 at 34 (Table SPA 3-1).

industry and its supporting infrastructure, including coal production, supply chain and transportation, as well as increasing challenges in maintaining aging coal units.¹¹

13. NCEMC jointly owning approximately 225 MW of the Proposed Facility's approximate 1,360 MW total capacity and serving its existing load is neutral to the Companies' planning need presented in the CPIRP. NCEMC is currently a wholesale power supply customer of DEP, taking service pursuant to a wholesale power supply and coordination agreement with DEP ("NCEMC Power Supply Contract"). The NCEMC Power Supply Contract allows NCEMC the right to co-own new baseload generation that DEP plans for development and construction to serve customer load in DEP. The NCEMC Power Supply Contract caps the maximum capacity NCEMC can own for the Proposed Facility at approximately 225 MW, and, as of March 14, 2024, NCEMC is exercising its right to jointly own the maximum allowable capacity of the Proposed Facility. NCEMC's joint ownership will result in a reduction in the NCEMC wholesale requirements load the Company would have otherwise been required to serve. In other words, NCEMC's joint ownership will reduce NCEMC's peak load and energy requirements the Company had been planning to serve by an amount equal to the capacity and energy to be produced by NCEMC's portion of the Proposed Facility.

14. The Proposed Facility is needed as part of the least cost plan to serve DEP's retail customers whether fully owned by DEP and used as part of the system to serve NCEMC's load through the NCEMC Power Supply Contract, or jointly owned with NCEMC and its energy and capacity serving NCEMC's load directly.

¹¹ See Exhibit 1A CPIRP Appendix F at 2-6.

NCEMC'S NEED FOR PROPOSED FACILITY

15. NCEMC anticipates using output from the CC as a capacity and energy product, lending it flexibility in serving its member cooperatives' load. The energy derived from the Proposed Facility will aid NCEMC in addressing the following critical portfolio planning objectives: (1) maintaining a desirable alignment of owned versus contracted resource, which currently "skew" towards purchases, rather than owned resources; (2) extending the anticipated "lifespan" of NCEMC's power supply portfolio by addressing expiring power purchase agreements; (3) managing NCEMC's fuel diversity through the introduction of additional natural gas resources; and (4) enhancing financial value.

COST

16. The total projected cost of constructing the Proposed Facility includes commercially sensitive information and is being provided to the Commission under seal pursuant to N.C.G.S. § 132-1.2 in Confidential Exhibit 3 to the Application.

17. Siting the Proposed Facility at Roxboro is part of the Companies' "replace before retire" strategy¹² to support an aggressive but orderly schedule of coal unit retirements and to accomplish their goal of repurposing infrastructure at existing power stations as the Companies continue to meet load growth and transition towards carbon neutrality by 2050. The Proposed Facility will be able to efficiently utilize existing plant

¹² See *Verified Amended Petition for Approval of 2023-2024 Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC*, Docket No. E-100, Sub 190 at 26 (Jan. 31, 2024) ("Appendix F contains the Companies' Coal Retirement Analysis, which provides a comprehensive analysis of the Companies' unit retirement strategy as well as risks and challenges as the Companies plan for an orderly exit from reliance on coal-fired generation. In addition, the Companies conducted supplemental coal retirement analysis as part of the Supplemental Planning Analysis that resulted in a substantially similar retirement dates. The Companies' proposal—which continues to plan for retirement of all remaining 8,400 MW of coal capacity by 2035—is the most reasonable and appropriate path to retire coal units at this point in time to enable an orderly 'replace before retire' approach to the energy transition that ensures reliability is maintained.").

infrastructure currently supporting Roxboro coal-fired Units 1 and 4.¹³ For example and as further described below, generator interconnection studies indicate that the Proposed Facility will be able to utilize existing transmission infrastructure and will only require limited network upgrades to safely interconnect to the grid. There is also sufficient DEP-owned land at Roxboro to support construction of the Proposed Facility without additional land acquisitions.

TECHNOLOGY

18. The hydrogen capable, advanced-class natural gas-fueled CC facility will have an estimated nominal winter capacity of 1,360 MW. The Proposed Facility will be a “2x1” CC generating facility comprised of two hydrogen capable, advanced-class combustion turbines, two heat recovery steam generators, and one steam turbine generator. The Proposed Facility will be more flexible than Roxboro Units 1 and 4, with five times their ramping ability, a key operating characteristic necessary to balance the variable operating characteristics of renewable generation and to ensure system reliability. The Proposed Facility will feature highly efficient, state-of-the-art generating technology that will have a 30% heat rate improvement over Roxboro Units 1 and 4. DEP is also designing the Proposed Facility to utilize bypass stacks that will allow continued operation of the facility’s combustion turbines if DEP is required to take other portions of the facility out of service.

¹³ The Commission has recognized that the ability to utilize existing infrastructure was a potential advantage of replacing coal-fired resources with new natural gas resources. Exhibit 1A Carbon Plan Order at 77 (“Additionally, the Commission recognizes Duke witness Roberts’ testimony that generator replacement (natural gas replacing coal) on existing sites may obviate the need for investment in significant transmission upgrades at certain sites.”).

19. The Proposed Facility will use natural gas as its primary fuel source and will be capable of utilizing ultra-low sulfur diesel as a back-up fuel source. Ultra-low sulfur diesel fuel will be kept onsite to ensure back-up fuel is available when needed.

TRANSMISSION AND FUEL SUPPLY

20. In March 2023, DEP filed a Generator Replacement Request (“GRR”) pursuant to the Companies’ Large Generator Interconnection Procedures established by the Companies’ Joint Open Access Transmission Tariff to utilize approximately 1,053 MW of transmission interconnection rights from Roxboro’s retiring coal units. The GRR process facilitates expedited interconnection of replacement generation at the point of interconnection of retiring generation and can, thereby, reduce or avoid the cost of certain interconnection facilities and potentially expensive network upgrades. The GRR Facilities Study indicated only limited network upgrades were necessary to reliably interconnect the replacement generation, and DEP has now executed an associated GRR Large Generator Interconnection Agreement to support interconnecting the replacement MW.

21. To support interconnection of the Proposed Facility’s incremental MW beyond those included in the GRR, DEP submitted an interconnection request into the 2023 Definitive Interconnection System Impact Study (“DISIS”) Cluster Study process. The Phase I DISIS study report indicated limited network upgrades are necessary to safely interconnect the Proposed Facility to the grid. The Company anticipates executing an Interconnection Agreement for the incremental capacity by the end of 2025.

22. In addition to leveraging GRR to efficiently utilize existing transmission capacity and to avoid new transmission upgrades, the Proposed Facility provides additional benefits to customers because, in the absence of replacement generation in the vicinity of

Roxboro’s retiring coal-fired Units 1 and 4, expensive transmission upgrades would be necessary to maintain system reliability and provide for replacement capacity and energy from a greenfield resource. Specifically, and as described in more detail in Exhibit 1B to the Application and further detailed in CPIRP Appendix L (Transmission Planning and Grid Transformation),¹⁴ siting the Proposed Facility at Roxboro sustains the voltage support necessary to serve DEP’s Wake County area load center and resolves the need for additional voltage support infrastructure once the Roxboro and Mayo coal units retire.

23. The Company has developed a strategy and executable plan to ensure sufficient natural gas firm transportation (“FT”) to the Proposed Facility. The Company has contracted to enable sufficient interstate FT natural gas capacity to support the Proposed Facility’s natural gas demand requirements that are incremental to the Companies’ existing CC fleet requirements. The Company has also contracted for intrastate FT rights with Public Service Company of North Carolina Inc., d/b/a Dominion Energy North Carolina (“PSNC”) as part of PSNC’s T15 Pipeline Reliability Project. PSNC filed the agreement with the Commission for its review and approval on October 16, 2023, in Docket No. G-5, Sub 668.

ENVIRONMENTAL

24. Operation of the Proposed Facility will result in the emission of certain pollutants that are regulated by the U.S. Environmental Protection Agency and the State of North Carolina. The North Carolina Department of Environmental Quality (“DEQ”) air quality permit application process will address operating impacts from these pollutants. The Company plans to submit a permit application to DEQ requesting a permit to authorize

¹⁴ Exhibit 1A CPIRP Appendix L at 29.

construction and operation of the Proposed Facility and its associated systems contemporaneous with this Application. The air permit application will include all required modeling and analysis to demonstrate compliance with applicable regulatory requirements and air quality standards.

25. From a technological and emission-control perspective, the Proposed Facility will feature highly efficient generation and environmental control technologies. The Company expects that replacing Roxboro coal-fired Units 1 and 4 with the Proposed Facility will reduce annual emissions of NO_x by 77% and SO₂ by 93%, while also reducing CO₂ emissions by approximately 60% per megawatt hour. The Proposed Facility will control emissions via combustion controls as well as Selective Catalytic Reduction, Carbon Monoxide (“CO”) Catalyst to control CO and volatile organic compounds emissions, and continuous emission monitoring systems on the exhaust stacks. The Company does not expect the application to trigger a Prevention of Significant Deterioration review under the Clean Air Act’s New Source Review program requirements and anticipates that DEQ will issue a final air permit within 18 months of application submittal. The Company provides additional information regarding permitting requirements for the Proposed Facility in Exhibit 2 to the Application.

INTENT TO SEEK ONGOING REVIEW

26. DEP intends to seek the Commission’s ongoing review of construction of the Proposed Facility pursuant to N.C.G.S. § 62-110.1(f) and Commission Rule R8-61(d) and (e). Accordingly, if the Commission issues the certificate the Joint Applicants are seeking through this Application, the Company plans to file an application and supporting

testimony seeking the Commission's ongoing review within 12 months of the date on which the Commission issues the certificate sought through this Application.¹⁵

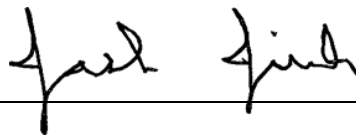
CONCLUSION

27. Commission issuance of a certificate of public convenience and necessity pursuant to N.C.G.S. § 62-110.1 for the Proposed Facility as applicable to DEP is consistent with (1) the Commission's determination in the Carbon Plan Order that it is reasonable for the Companies to plan for new CC generating capacity; (2) the Companies' updated CPIRP Execution Plan and NTAP to place a new CC into service by January 1, 2029, to meet load growth, maintain system reliability, and to facilitate the orderly retirement of Roxboro Units 1 and 4; and (3) N.C.G.S. § 62-110.1(e)'s framework that construction of new generating facilities be part of the least cost path to achieve compliance with statutory carbon reduction goals, maintain or improve upon the adequacy and reliability of the existing grid, and that construction and operation of the facility be in the public interest. Similarly, Commission issuance of a certificate of public convenience and necessity pursuant to N.C.G.S. § 62-110.1(a) for the Proposed Facility as applicable to NCEMC will allow NCEMC to reliably and affordably meet the electricity needs of its members.

WHEREFORE, the Joint Applicants respectfully request that the Commission issue a certificate pursuant to N.C.G.S. § 62-110.1, determining that the public convenience and necessity requires construction of the Proposed Facility, and requests such further relief as the Commission deems just and proper.

¹⁵ See Commission Rule R8-61(e) ("A public utility requesting an ongoing review of construction of the generating facility pursuant to G.S. 62-110.1(f) shall file an application, supported by relevant testimony, for an ongoing review no later than 12 months after the date of issuance of a certificate of public convenience and necessity...").

Respectfully submitted this 28th day of March, 2024.



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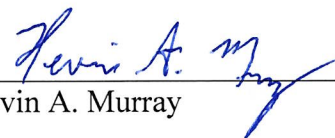
*Counsel for North Carolina Electric Membership
Corporation*

VERIFICATION

| | | |
|-------------------------|---|--------------------------|
| STATE OF NORTH CAROLINA |) | |
| |) | DOCKET NO. E-2, SUB 1318 |
| |) | |
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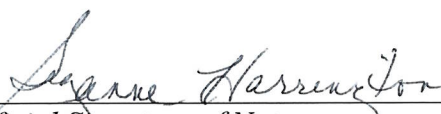
Kevin A. Murray, being first duly sworn, deposes and says:

That he is Vice President of the Project Management and Construction organization within Duke Energy Business Services, LLC; that he has read the foregoing Joint Application and Exhibits being filed by Duke Energy Progress, LLC and North Carolina Electric Membership Corporation and knows the contents thereof; that the same is true and accurate as to applicant Duke Energy Progress, LLC, and as to those matters stated therein relating to applicant North Carolina Electric Membership Corporation or otherwise stated upon information and belief, he believes them to be true.



 Kevin A. Murray

Sworn to and subscribed before me this 27th day of March, 2024.



 Official Signature of Notary

Suzanne Harrington, Notary Public
Notary's printed or typed name

My Commission Expires: 08/18/2024



STATE OF NORTH CAROLINA
UTILITIES COMMISSION
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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)
Application of Duke Energy Progress,)
LLC and North Carolina Electric)
Membership Corporation to Construct)
New Natural Gas-Fueled Combined)
Cycle Combustion Turbine Units at)
Existing Electric Generating Facility in)
Person County, NC)

VERIFICATION AND
SIGNATURE

PERSONALLY APPEARED before me Amadou Fall, who, after first being
duly sworn, said:

1. That he is the Senior Vice President, Power Supply Division, and Chief Operating Officer (“COO”) of the North Carolina Electric Membership Corporation (“NCEMC”), and that he has read the joint application of Duke Energy Progress, LLC and NCEMC to construct new natural gas-fueled combined cycle combustion turbine units at existing electric generating facility in Person County, NC, and knows the contents thereof; and
2. The matters stated in the Application are true, except as to those matters that are stated therein on information and belief, and, as to those matters, he believes them to be true.

Amadou Fall

Amadou Fall
Senior Vice President and COO,
North Carolina Electric Membership Corporation

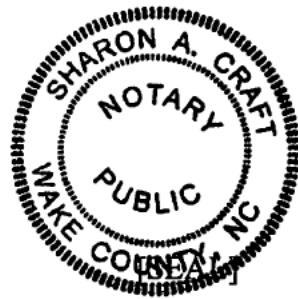
Sworn to and subscribed before me
this 27th day of March, 2024.

Sharon A. Craft

Notary Public

Print Name: Sharon A. Craft

My Commission Expires: 03/24/2025



CERTIFICATE OF SERVICE

I hereby certify that copies of Duke Energy Progress, LLC's and North Carolina Electric Membership Corporation's Joint Application for a Certificate of Public Convenience and Necessity to Construct a 1,360 MW Natural Gas-Fueled Combined Cycle Electric Generating Facility in Person County, North Carolina as filed in Docket Nos. E-2, Sub 1318 and EC-67, Sub 55 were served electronically upon all parties of record.

This, the 28th day of March, 2024.

/s/ E. Brett Breitschwerdt

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