Kendrick C. Fentress
Associate General Counsel

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May 3, 2021

VIA ELECTRONIC FILING

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

RE: Market Competitiveness Study of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Piedmont Natural Gas Company, Inc. Docket No. E-7, Sub 1100D, E-2, Sub 1095D and G-9, Sub 682D

Dear Ms. Campbell:

Enclosed please find the Market Competitiveness Study (the "Study") of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Piedmont Natural Gas Company, Inc. (collectively, the "Companies") required by Regulatory Condition No. 5.2 in connection with the referenced matter. Portions of the Study contain confidential, proprietary and competitively sensitive information, and are being filed under seal. The Companies respectfully request protection of this information pursuant to N.C. Gen. Stat. §132-1.2.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Kendrick C. Fentress

Kendrick C. Fentress

Enclosure
cc: Parties of Record

CERTIFICATE OF SERVICE

I certify that a copy of Market Competitiveness Study of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Piedmont Natural Gas Company, Inc., in Docket Nos. E-7, Sub 1100D, E-2, Sub 1095D and G-9, Sub 682D, has been served by electronic mail, hand delivery, or by depositing a copy in the United States mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 3rd day of May, 2021.

Kendrick C. Fentress

_____

Kendrick C. Fentress
Associate General Counsel
Duke Energy Corporation
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Raleigh, NC 27602
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2021 Market Study Assessment Guidelines

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Ethics & Compliance, Corporate Compliance, Joan De Vera

Effective Date:	05/01/2016
Revision Date:	03/01/2021

Applicable Regulatory Condition

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, or Piedmont to or from Affiliates or Nonpublic Utility Operations.

Except as to transactions between and among DEC, DEP, and Piedmont pursuant to filed and approved service agreements and lists of services, and subject to additional provisions set forth in the Code of Conduct,DEC, DEP, and Piedmont shall take the following actions in connection with procuring goods and services for their respective utility operations from Affiliates or Nonpublic Utility Operations and providing goods and services to Affiliates or Nonpublic Utility Operations:

(a) DEC, DEP, and Piedmont each shall seek out and buy all goods and services from the lowest cost qualified provider of comparable goods and services, and shall have the burden of proving that any and all goods and services procured from their Utility Affiliates, Non-Utility Affiliates, and Nonpublic Utility Operations have been procured on terms and conditions comparable to the most favorable terms and conditions reasonably available in the relevant market, which shall include a showing that comparable goods or services could not have been procured at a lower price from qualified non-Affiliate sources or that DEC, DEP, or Piedmont could not have provided the services or goods for itself on the same basis at a lower cost. To this end, no less than every four years DEC, DEP, and Piedmont shall perform comprehensive non-solicitation based assessments at a functional level of the market competitiveness of the costs for goods and services they receive from a Utility Affiliate, DEBS, another Non-Utility Affiliate, and a Nonpublic Utility Operation, including periodic testing of services being provided internally or obtained individually through outside providers. To the extent the Commission approves the procurement or provision of goods and services between or among DEC, DEP, Piedmont, and the Utility Affiliates, those goods and services may be provided at the supplier's Fully Distributed Cost.

(b) To the extent they are allowed to provide such goods and services, DEC, DEP, and Piedmont shall have the burden of proving that all goods and services provided by any one of them to Duke Energy, a Non-Utility Affiliate, any other Affiliate, or a Nonpublic Utility Operation have been provided on the terms and conditions comparable to the most favorable terms and conditions reasonably available in the market, which shall include a showing that such goods or services have been provided at the higher of cost or market price. To this end, no less than every four years DEC, DEP, and Piedmont shall perform comprehensive, non-solicitation based assessments at a functional level of the market competitiveness of the costs for goods and services provided by either of them to a Utility Affiliate, DEBS, another Non-Utility Affiliate, any other Affiliate, and a Nonpublic Utility Operation.

(c) The periodic assessments required by subdivisions (a) and (b) of this subsection may take into consideration qualitative as well as quantitative factors. To the extent that comparable goods or services provided to DEC, DEP or Piedmont, or by DEC, DEP or Piedmont are not commercially available, this Regulatory Condition shall not apply.

Statement of Purpose and Philosophy:

The purpose of this market study analysis is to provide adequate evidence of compliance with Regulatory Condition 5.2 (see above); and the Vantage Audit Recommendation (III-R1) (Issued, March 29, 2016):

- *Which states, DEC and DEP should be required to develop a process for identifying those services that have an open market competitor and perform comprehensive assessments of the competiveness of such services as required by Regulatory Condition No. 5.2* ***(shown on page 1)***

Each process provides details of the cost-benefit analysis performed by service company functions provided to DEC/DEP/Piedmont and an explanation of how costs are compared against an open market competitor to ensure the most favorable terms and conditions for the utility.

Core Utility Functions are defined in Regulatory Condition 5.3 and are considered Core Competencies of Duke Energy. These services are critical to the operations of the utilities and are not generally available on the open market due to their nature. Therefore, they are not included in this market review process. They are included, however, in the enterprise-wide CORE salary benchmark review process, discussed herein.

The Duke Energy Corporate Compliance team partnered with Legal and the DEBS functions to provide methodology and process documentation for assessing the cost of services provided by DEBS to DEC/DEP/Piedmont.

Expectations:

To capture detail and documentation for the following processes:

- ***CORE (Compensation Ongoing Review & Evaluation) Process***
- ***DEBS Functions Market Assessment Process Documentation and Evidence***

2021 Duke Energy Market Study Documentation and Evidence

1. ***CORE (Compensation Ongoing Review & Evaluation) Process:***

CORE is identified as being the internal vehicle to compare market salary competiveness to Duke Energy's compensation salary bands across the enterprise for FTE's:

The CORE Process:

- The Duke Energy Compensation team identifies pay for specific types of work to benchmark salary range bands.
- The median salary survey pay of similar companies is benchmarked to establish a salary range for each job title.
- The process is performed across the enterprise by the HR Compensation Department on a continuous cycle.

Documents to be included in Market Study Report for CORE:

- CORE Process Guidelines
- Schedule showing the timeline for the review of Benchmarks

2. ***DEBS Functions Market Assessment Process Documentation and Evidence***

The following DEBS Services are listed on the approved services list for DEC, DEP, and Piedmont and will be reviewed in the scope of the Market Study Assessment, except for Nuclear Development which is no longer active and Meters which is related to Meter Labs and part of the utility, not DEBS:

Service	Official Description or Exception List
Accounting	Maintenance of financial books and records; preparation of financial and statistical reports and tax filings; supervision regarding compliance with related laws and regulations.
Environmental Health and Safety	Establishment of programs, policies and procedures, and governance framework for environmental and health and safety programs and compliance; provision of compliance support.
Executive	Provision of general, administrative, and executive management oversight and direction; Services related to the following functions: integration and improvement, sustainability, emerging technologies, federal policy and government affairs.
Facilities	Operation and maintenance of office and service buildings; security and housekeeping for such buildings; procurement of office furniture and equipment.
Finance	Services associated with investments, financing, cash management, risk management, budgeting, financial forecasting, and economic analyses.
Grid Solutions	Grid modernization services: planning, outreach, technology and engineering planning and standards, project management and governance, project execution.
Human Resources	Establishment and administration of policies, and supervision of compliance with legal requirements, in the areas of employment, compensation, benefits and employee health and safety; payroll and employee benefits payment processing; supervision of contract negotiations and relations with labor unions.

Service	Official Description or Exception List
Information Systems	Development and support of mainframe and distributed computer software applications; procurement and support of personal computers and related network and software applications; installation and operation of communication systems; and management and support of information systems.
Internal Auditing	Review of internal controls and procedures to ensure that assets are safeguarded and that transactions are properly authorized and recorded.
Investor Relations	Preparation of communications to investors and the financial community; performance of transfer agent and shareholder record keeping functions; administration of stock plans; regulatory reporting related to stock.
Legal	Services related to labor and employment law, litigation, contracts, rates and regulatory affairs, environmental matters, financing, financial reporting, real estate and other legal matters.
Meters	Procurement of meters.
Nuclear Development	Provision of design, engineering, project management and licensing for new operating units.
Planning	Facilitation of strategic and operating plans preparation; monitoring of trends; evaluation of business opportunities.
Power Engineering and Construction	Services related to the following functions: Enterprise Project Management Center of Excellence; Project Development and Initiation; Project Management and Construction fossil/hydro retrofits; major project Engineering and Construction Services; Commercial and International Project Management and Construction; performance improvement/management.
Power Planning and Operations	Production cost modeling and data management; Services related to the following functions: • Strategic Programs • Bus Svcs Workforce Strategy • Engineering Services • Doc Con/Config Mgmt • Technical Apps • NERC Compliance.
Public Affairs	Preparation and dissemination of information to

Service	Official Description or Exception List
	employees, customers, government officials, communities, and the media; provision of associated communications materials.
Rate Design and Analysis	Services related to rate design and analysis, and rates support.
Rights of Way	Purchases, sales, management, surveying, and recording of real estate interests.
Supply Chain	Procurement of materials and contract services and related strategy and support.
Transportation	Procurement and maintenance of aircraft and procurement and maintenance of vehicles and other power-operated equipment.

DEBS Functions Market Assessment Process Documentation and Evidence:

Input from SME's includes (not definitive, but suggested):

- Description of the function and the service provided to DEC/DEP/Piedmont.
- Written process documentation or a short narrative explaining how the service function performs a cost-benefit analysis.
- Evidence that the process has been applied in the last 4 years, if applicable.
- Current employee to contingent worker ratio for the function (i.e. total count and %).
- Indicate where the Function should be charted on the **Feasibility Matrix (shown below) and reason why.**
- Point of contact for the Function – individual(s) who will be able to attest to the process provided should an auditor review the market study report and send data requests.

The Feasibility Matrix for Service Company Functions:

1. Operational Impact to the Regulated Utility
   - Rated between 1 (Low Risk) and 10 (High Risk)
2. Relation to Core Competency (Tied to Core Competency)
   - Rated between 1 (Low Relation to Core Competency) and 10 (High Relation to Core Competency)

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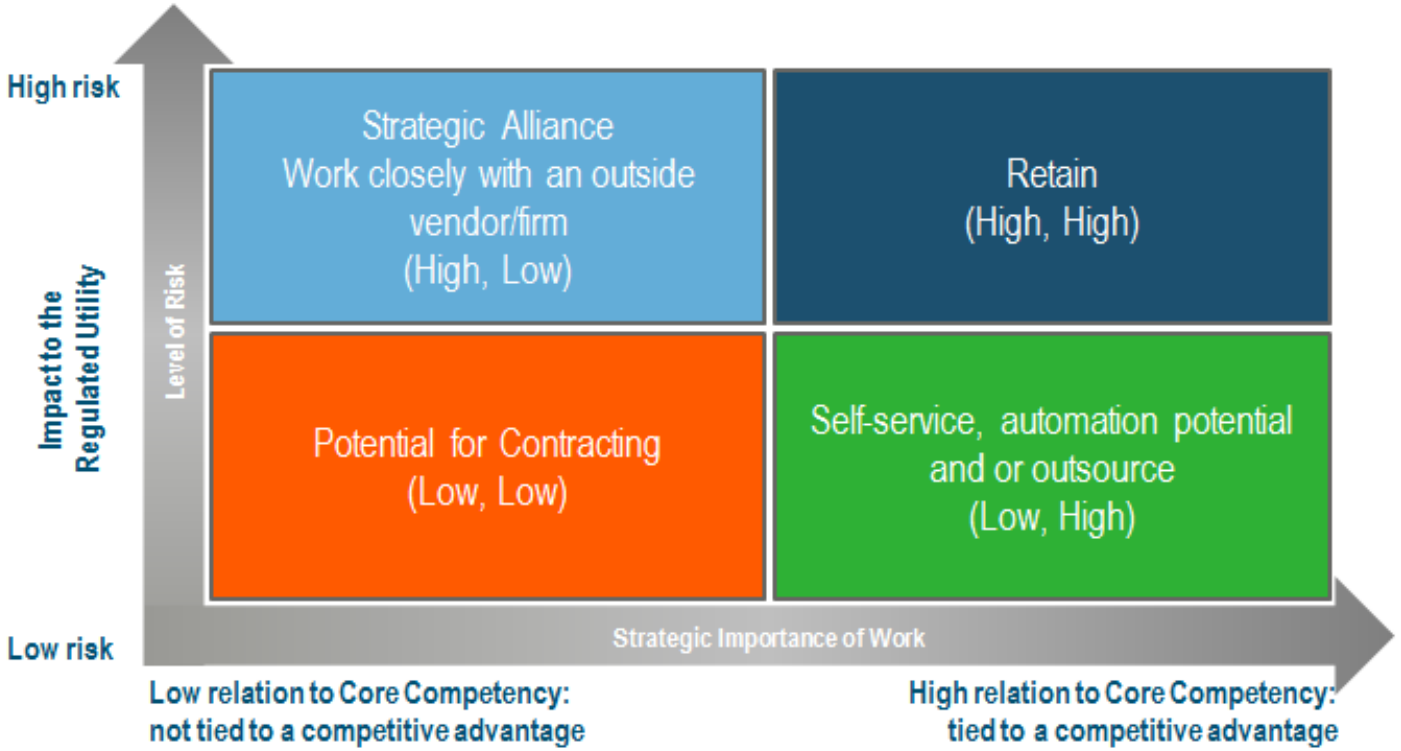


Assessing the Service Functions Alignment to Core Competencies

Each examined Service Function falls into one or more of the categories below, based on the criteria provided by the business area as to the risk to the utility and its relation to Core Competencies

Potential for Contracting	Strategic Alliance	Self-service, automation potential and or outsource	Retain
• *Process is very standardized* • *Large number of other firms who can perform the same service more efficiently* • *Low risk and low importance with regards to Core Competencies*	• *High risk around the process* • *Suggestion is to work closely in an alliance with a vendor* • *Strict oversight and vendor management will need to be in place to ensure risk mitigation*	• *Strategically important to the company, but very low risk* • *Automation or outsourcing could free up resources*	• *Components are critical to the enterprise* • *High analytical competencies needed* • *Limited number in talent pool* • *Important to customers* • *Embedded in organization* • *Unique competitive advantage* • *Strategic Service* • *Core Competencies*

5

The Compensation Ongoing Review & Evaluation Process

Background

The **Compensation Ongoing Review & Evaluation, or CORE,** process is designed to ensure that Duke Energy continues to have competitive pay ranges for employees. This process will ensure proactive and routine monitoring of market values and trends for jobs and competitive alignment of jobs within the existing salary structure.

On a continuous cycle, all non-union positions will be examined so that every job will have been reviewed against current market conditions to ensure the salary range is set at the appropriate level.

Methodology

Duke Energy employs a market-based compensation strategy. The compensation team identifies pay for specific types of work to benchmark salary ranges and ensure our jobs are competitive with companies that are similar to Duke Energy in size and revenue. The median salary survey pay of similar companies is benchmarked to establish a salary range for each job.

Jobs will be identified by the CORE process and prioritized, considering market conditions and business drivers. Feedback from line management and Human Resources partners will be incorporated to help determine market conditions and job prioritization. Job descriptions will be collected to document the work performed and ensure compliance with the Fair Labor Standards Act (FLSA). As needed, cross-department or organization peer teams will be identified to assess work similarities or differences in various areas to ensure equity and consistency across the company. Benchmark salary survey data will be reviewed, a salary range recommendation will be confirmed by management, and an employee impact analysis will be completed.

Scope

All non-union positions, specifically:

- New, or changed, jobs
- High demand jobs (i.e. unusually high turnover or difficulty with hiring)
- Jobs impacted by changing market conditions (i.e. spikes in relevant market data)

Other items to be considered are:

- Updating or establishing job descriptions without recent documentation

Process

1. Compensation conducts market evaluation
2. Compensation confirms job documentation is up to date
3. Compensation makes salary range recommendations
4. Legal conducts FLSA reviews, as needed
5. Management confirms salary range recommendations
6. Implementation of CORE results

Continuous approach outlined:

Q4

- Update of annual market data (refresh of compensation survey data in October)
    - Matches for new survey jobs processed

Q1

- Identify non-union jobs for review, collect/apply benchmark data from survey data cuts that are similar in size and revenue
- Review existing job documentation to ensure accuracy of market benchmarks
    - Management: Develop/Update job documentation, as needed
    - Review cross-departmental survey matches for internal alignment
- Obtain any additional emerging market trends from stakeholders
- Conduct market analysis by comparing Duke Energy salary grade midpoints to market median figures (report refreshed frequently throughout the year)
    - Analysis considers attrition, number of active incumbents, hierarchical roles
- Identify market outliers for deeper review

Q2/3

- Prioritize key outlier jobs in partnership with line management and human resources partners
- Consider calibration/alignment of cross-departmental pricing
- Review findings of market outliers with line management and provide recommendations and impacts of recommended changes
- Review and approval by leadership
- Communicate changes to impacted employees

Ongoing

- Update benchmark salary survey data based on new or revised job descriptions

Reminder - CORE is not:

- A mechanism to automatically increase or decrease employee pay
- An internal equity assessment of employee's base pay

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Accounting

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

NA

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Key processes include:
a) Maintaining the books and records of Duke Energy Corporation and its affiliates
b) Preparing financial and statistical reports
c) Tax - prepare tax filings, tax strategy, tax compliance for income and other taxes, and income tax accounting.
d) Supervising compliance with the laws and regulations

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

There are limited areas within the Accounting service function that could be outsourced. Accounting support for utility operations is a specialized function.
Tax functions and potentially areas within Accounting Research are some of the limited areas for which outsourcing could be evaluated. The Accounting Research group is a small group with fewer than 5 employees and therefore has not been evaluated. Furthermore, outsourcing of this group would be

utilizing staff with the caliber of Technical Accounting individuals from a Big 4 Accounting Firm. Billing rates for this class of individual would be cost prohibitive.
The company has evaluated the cost-benefit of outsourcing the entire tax function. In August of 2018 the entire tax function except for 4 tax individuals was outsourced to E&Y.
The company evaluated EY's expertise in developing tax talent, driving efficiency through digital capabilities, improving tax processes, and reacting to the accelerating pace of regulatory and legislative change. Duke Energy chose to partner with a firm that has access to more advanced digital capabilities and has demonstrated the ability to help drive process improvements at a faster pace, which benefits both the company and customers.
The Accounting function has utilized contractor staff augmentation to fill vacancies as needed. The rates being charged for these employees are at rates comparable or higher than senior accountants. This is based on billings received for staff augmentation.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- The E&Y Tax Outsourcing Study is a Confidential Document maintained by Cooper Monroe.

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Controller 199 FTE's, 24 Contractors 10.8%
- Tax 5 FTE's, 0 Contractor
- Total 204 FTE's, 24 Contractors 10.5%

6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:

10

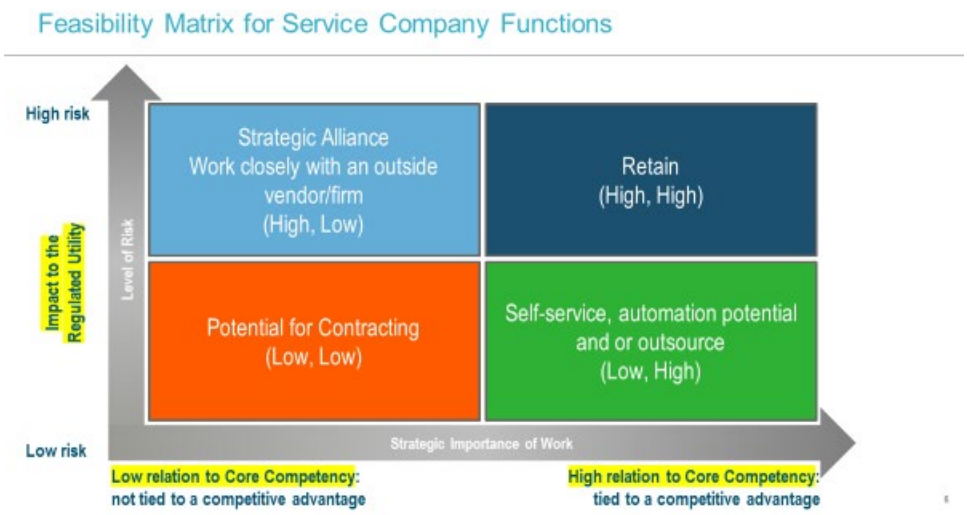
Proper Accounting Compliance is a fundamental element in the rate recovery process.

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:

9

A number of outside providers could provide selected accounting functions. No one provider could support the depth and breadth of all the accounting service functions.



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Jeff Setser

Job Title: Director Allocations & Reporting

Organization/Department: Corporate Accounting / Controller

Telephone Number: 704-519-5139

Email Address: jeff.setser@duke-energy.com

Date Form was Completed: 3/31/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Accounting Submission Form

Attachment Filed under Seal

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
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5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Enviromental Health and Safety

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Not applicable.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Establishment of programs, policies and procedures, and governance framework or environmental and health and safety programs and compliance; provision of compliance support. Functions include:

Governance Function
EHS governance includes corporate level activities to assure compliance with all applicable environmental, health and safety laws, regulations, and internal standards.

Oversight Function
EHS oversight includes critically monitoring, assessing, and evaluating the performance of operations to ensure compliance with environmental, health and safety programs and expectations.

Support Function
EHS support includes guiding, directing, and providing resources to aid in the execution of environmental, health and safety programs/ functions/ processes.

Perform Function
EHS executes and achieves outcomes for EHS implementation.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

- EHS frequently performs formal and informal benchmarking through EHS peer groups such as NAEM, ORCHSE and the Campbell Institute. EHS also performs formal and informal benchmarking with utility peer groups (EEI, EPRI) and informal benchmarking directly with other utilities.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

EHS performed formal and informal benchmarking through EHS peer groups such as NAEM, ORCHSE and the Campbell Institute. EHS also performed formal and informal benchmarking with utility peer groups (EEI, EPRI) and informal benchmarking directly with other utilities.

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 410 FTE/73; 18%

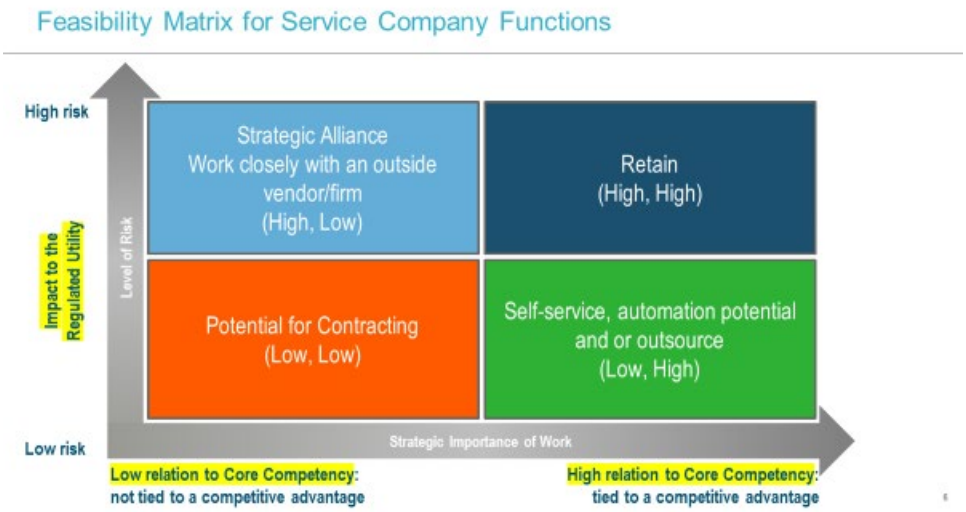
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)

1-Low to 10-High:
8



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name:	**Shayne Wiesemann**
Job Title:	**Manager, EHS Systems**
Organization/Department:	**Environment, Health & Safety**
Telephone Number:	**980-373-1713**
Email Address:	**shayne.wiesemann@duke-energy.com**
Date Form was Completed:	**3/24/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Executive

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

The Executive Rewards function facilitates the documentation of the company's priorities. The function designs incentive programs and policies that reward executives and employees based on the achievement of those priorities. The function is also responsible for providing market competitive rewards. This function is a "Retain" line of business in the Feasibility Matrix because it has a high impact to the regulated utilities as well as high impact to strategic importance.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Because of the Retain status and because the executives at Duke Energy are not comparable to a commercial market, the Executive Compensation function within HR manages the terms and conditions by which the executives are compensated and works with Accounting to determine how their services are allocated. Activities of the Executive Rewards function are overseen by the Compensation and People Development

Committee of the Board of Directors.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- N/A

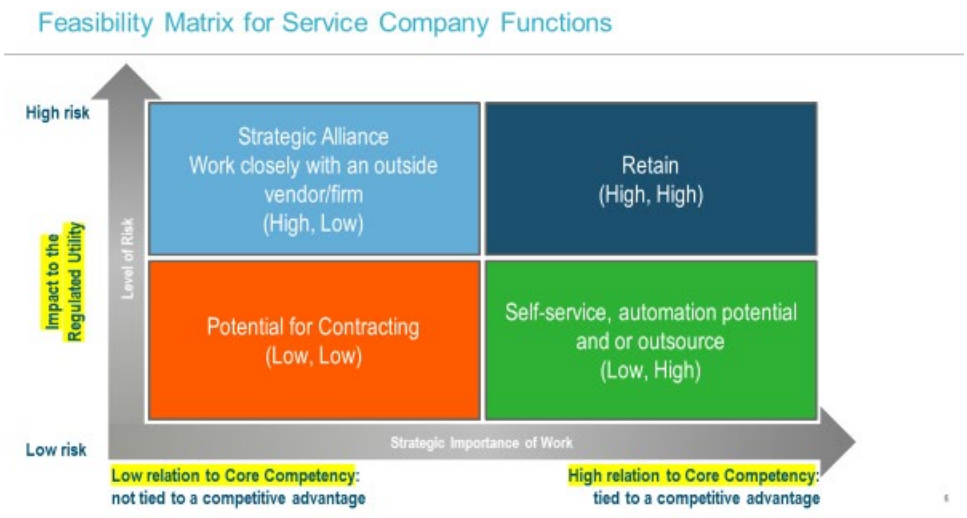
5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - N/A
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   10

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   10



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Scott Smith

2021 Duke Energy Market Study

Job Title: Director, Executive Rewards

Organization/Department: Human Resources

Telephone Number: 980-373-7178

Email Address:scott.smith6@duke-energy.

Date Form was Completed: 3/22/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Facilities

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

NA

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Duke Energy Real Estate manages most of Duke Energy's and PNG's buildings and sites throughout the Duke Energy/PNG service territory serving electric and gas customers. This management includes all daily operational care and maintenance of buildings & grounds within our office and equipment buildings, which also includes building maintenance for unoccupied operational buildings such as electric substation and telecommunication buildings. All facilities management work for DEC, DEP and PNG are outsourced to a significant real estate management outsource provider. Duke Energy benefits not only from the expertise of this provider, but also in acquiring labor skills, technologies, and cost advantages in the operations and maintenance of our facilities.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

While there are numerous industry organizations related to facilities management, IFMA (International

Facilities Management Association) offers benchmarking services annually. Furthermore, this organization provides benchmarking opportunities related to the utility sector specifically. Provided in this submission is the result of the latest 2020 IFMA utilities benchmarking study

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- UC Executive Report (2).pdf
- UC FM Data Report.pdf
- This 2020 benchmarking study looks at Real Estate operating costs of utility companies and looks at these costs across different types of managed space (headquarters, data centers, field locations, etc). Facilities uses this to compare how its performance to peer businesses in the utility industry. The Company has a confidentiality agreement with IFMA; therefore, this study is being filed under seal.

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Total Count = 53 (2 Employees / 51 Contingent Workers)

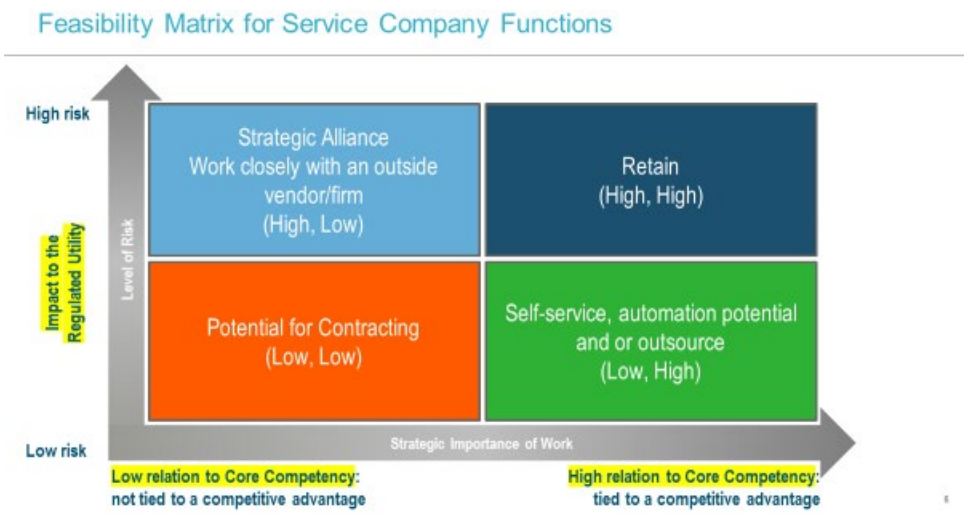
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
7

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
5



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name:	**Dawn M. Waldrop**
Job Title:	**Director, Real Estate Asset Management**
Organization/Department:	**Administrative Services – Real Estate Operations**
Telephone Number:	**704-382-6866**
Email Address:	**Dawn.Waldrop@duke-energy.com**
Date Form was Completed:	**3/22/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Facilities Submission Form

Attachment Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Finance

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Financial Planning & Analysis (FP&A)

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Duke Energy has a centralized Finance function which helps drive efficiency and consistency across the organization. FP&A develops, shapes, and communicates a dynamic and integrated financial plan for Duke Energy and its jurisdictional utilities in concert with the business in a timely fashion consistent with the Duke Energy Corporation's strategy and expectations of our customers and shareholders.

Key service offerings / business processes supported include, but are not limited to the following:
1. Budgeting process
2. Forecasting process
3. Reporting and analysis
4. Financial support to functional areas

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

- The FP&A group conducts benchmarking on an ad hoc basis periodically. The most recent benchmarking efforts were performed in conjunction with the corporate strategic objective of cost containment during the 2015-2016 timeframe. The benchmarking efforts conducted focused on operational efficiency / performance metrics as well as financial cost comparisons. The benchmarking compares Duke Energy to other large, multi-national, capital intensive companies, as well as against other utilities.
- Since the time of the last studies, FP&A has focused on implementing efficiencies and significantly reducing headcount (as noted in section #5 below). On average, labor represents over 90% of FP&A's total cost structure.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

Our most recent benchmarking studies are from the 2015-2016 timeframe, both of which are confidential and listed below:

- PWC Benchmark Analysis – 2015
- Corporate Executive Board Finance Performance Benchmark Study – 2016

Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

5)

- Total staff 223 (as of 2/28/2021)
- Total full-time employees (FTE's) of 220 (as of 2/28/2021)
- Total contingent workers (CW's) of 3 (as of 2/28/2021)
- Ratio of FTE's to total staff count is 99% or 220 / 223 (as of 2/28/2021)
- Headcount has been steadily declining since 2016 when total headcount was 264.

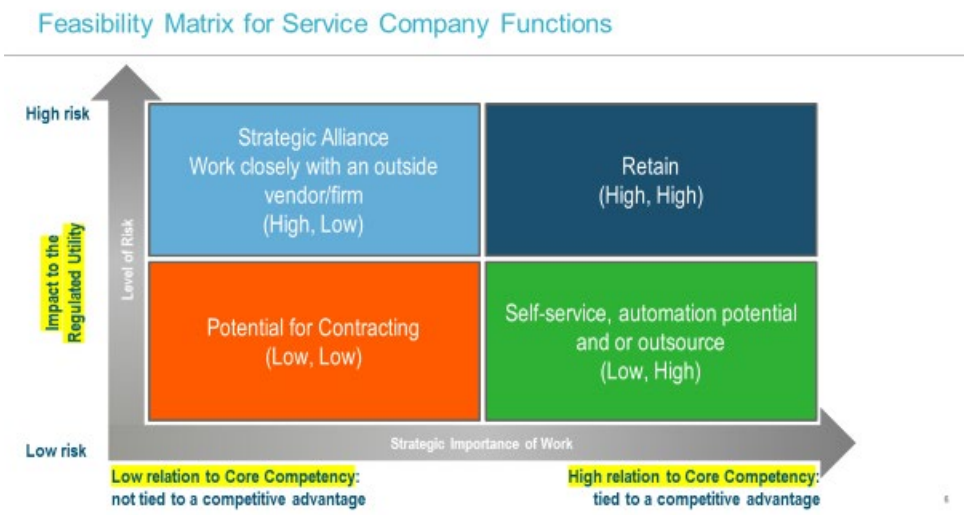
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
10



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Bill Currens

Job Title: Sr. Vice President, Financial Planning & Analysis

Organization/Department: Finance

Telephone Number: 704-382-1603

Email Address: Bill.Currens@duke-energy.com

Date Form was Completed: April 1, 2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Finance – Financial Planning & Analysis Submission Form

Attachments Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Finance

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Insurance

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

The Insurance group provides coverage for Property, General & Auto Liability and Workers' Compensation through its captive insurance companies. The Insurance group coordinates the placement of insurance and the management of claims.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

The Insurance group reviews the programs on at least an annual basis to determine the efficiency and effectiveness of the programs. It takes to steps to reduce costs and risk whenever prudent.

The Financial and Risk Management Committee (FRMC), a Duke Energy Board of Directors sub-committee, has oversight responsibility for the function. The Chief Risk Officer provides periodic updates to the FRMC on insurance coverages and potential risks of Duke Energy.

It utilizes a Third-Party Administrator (TPA) to manage workers' compensation, general & auto liability claims. All property claims are managed in-house by the Claims Manager. Insurance annually reviews the service agreement with the TPA for pricing and services.

Internal labor is charged using the corporate allocation factor DGFI.

In the past, Duke insurance representatives have met with the Public Staff of the North Carolina Utilities Commission to review the annual premium billing models to the regulated entities.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- Click here to enter text.

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 100% FTE

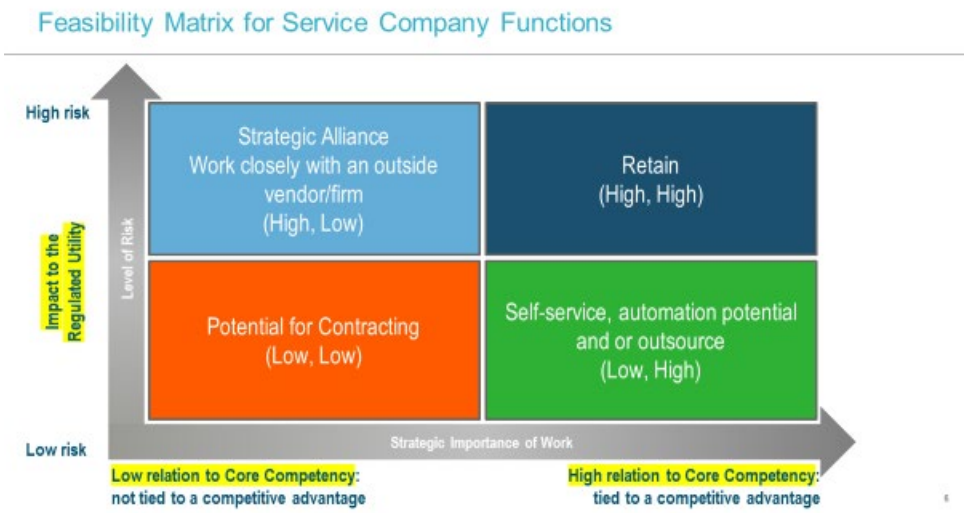
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
10



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name:	**Arnold Garcia**
Job Title:	**Director, Insurance**
Organization/Department:	**Global Risk Management & Insurance**
Telephone Number:	**980-343-4744 (o), 704-609-0445 (m)**
Email Address:	**Arnold.garcia@duke-energy.com**
Date Form was Completed:	**4/7/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to Joan De Vera ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Finance

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Treasury

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Treasury function and services include: Manage short-term debt (commercial paper) and provide daily funding of the corporation's bank accounts, issue corporate and utility long-term debt at attractive rates including complex structured debt transactions, and manage the relationships with the rating agencies and banking partners

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:
The

The industry standard is to maintain the Treasury Department in house. The detailed corporation and regulated utility knowledge are beneficial for understanding the utility business and the cash needs, as well as the long-term funding, including complex Treasury transactions. Such transactions include expertise in the Utility Money Pool Agreement and other securitization transactions. Through the Finance and Risk Management Committee, the Duke Energy Board of Directors maintains oversight of the Treasury function. The Duke Energy board sets the financing authority each year for the corporation. Additionally, Duke Energy Corporation, DEC and DEP file periodically with the North Carolina Utilities Commission for the authority to issue first mortgage bonds and senior unsecured notes up to a set dollar amount.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- N/A

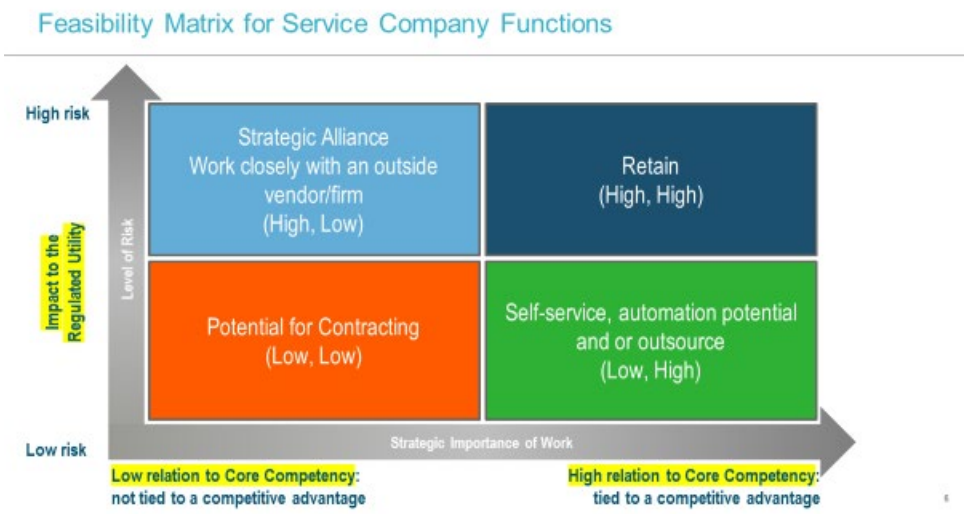
5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - Treasury is 100% FTEs with no contingent workers
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   10

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   10



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Chris Bauer

Job Title: Director, Corporate Finance and Assistant Treasurer

2021 Duke Energy Market Study

Organization/Department: Treasury

Telephone Number: 704-382-5826

Email Address: chris.bauer@duke-energy.com

Date Form was Completed: 3/25/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Grid Solutions

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:
From the previous time Market Study was held there have been organizational changes in the Customer Delivery organization and Grid Solutions is no longer in place. Some of the services and activities that Grid Solutions provided have been broken up and moved to other parts of the Customer Delivery Organization and will respond to this Market Study Request with the services and activities that still apply.

Of the activities and services offered it includes regulatory planning, regulatory outreach, technology and engineering planning and standards, project management governance in support of the DEC's and DEP's strategic objectives.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:
DEC and DEP have a significant amount of project work that occurs outside of regular utility maintenance. Much of this work is supported by functions that were under Grid Solutions department. Project work is usually short in duration and often requires a person with a specific skill set to help accomplish the project on time and on budget.

When management considers whether to hire contract labor versus an employee, the two main questions that need to be answered are: "What is the duration of this work/project expected to be?" and "Do we already have someone with the skill set needed on staff?" If the project is short in duration (less than 3 years), then the decision will be made to hire contract labor. Supply Chain Department tracks average rates for the roles that are typically filled by contract labor. This allows the organization to remain competitive in the market and prevents DEC and DEP from overpaying for resources.

If the resource requirement is for a long-term program that aligns with the 5-15 year strategic plan, then the decision might be made to hire an employee. This allows the company to grow and retain talented resources that will be beneficial for the long term while mitigating the higher cost of short-term contract labor. If the roles and responsibilities of the resource include managing other resources, then those positions are typically filled with employees. For subject matter expertise, a blend of resources is used to maintain continuity between projects and retain specific skillsets in the employee base.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- Sourcing has formal acquisition methodologies which includes a "common" evaluation process with specific weights and scoring criteria, below is a description of how Sourcing acquires and qualifies bids for services

1. Establish a qualified bid pool
   a. Often an Request for Information ("RFI") is submitted to all known vendors for a particular service or material. The list of vendors is considered "confidential," but includes Scope Services, Grid One, Utility Partners of America, and Smart Grid Solutions for DEC. The RFI may include questions around safety records, company finances/stability, technical ability, etc. Based on the RFI response, a shortlist of bidders is determined.
2. Distribute the Request For Proposals
   a. A Scope of Work, Bidder's instructions, and any other relevant documents (specifications, etc.) are distributed to the bidders through the PowerAdvocate tool. All communications and questions go through this tool. Any communication outside of the tool may result in disqualification of a bidder. Bidder's instructions will list all the information Grid Solutions requires to be submitted. This includes (but is not limited to) information on Corporate Responsibility (Diversity, Environmental Stewardship, Local Impact).
3. Receive the bids
   a. A criteria-based decision matrix is used to evaluate the bids. There will be specific criteria and metrics looked at for high level buckets such as Commercial, Technical, and Corporate Responsibility. Each bid has different criteria and weights based on importance to the project or category. All criteria, weights, and metrics are determined by the bid team prior to getting any bids back. The bid team includes sourcing, the project director, and AMI project managers.
4. Select the most beneficial opportunity
   a. The criteria-based decision matrix is used to facilitate an informed discussion to ensure all exploration of all critical areas before forming a recommendation. Once the bid team determines its recommendation, a strategy paper is created and formulated by the bid team and the Business Unit and Supply Chain must approve based on Delegation of Authority. This is part of a Stage Gate process.

5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - As of April 22, 2021, the functions identified had a total of 130 resources consisting of 78 FTEs and 52 are CWs. The FTE to contingent worker ratio equals 60% FTE to 40% CW.

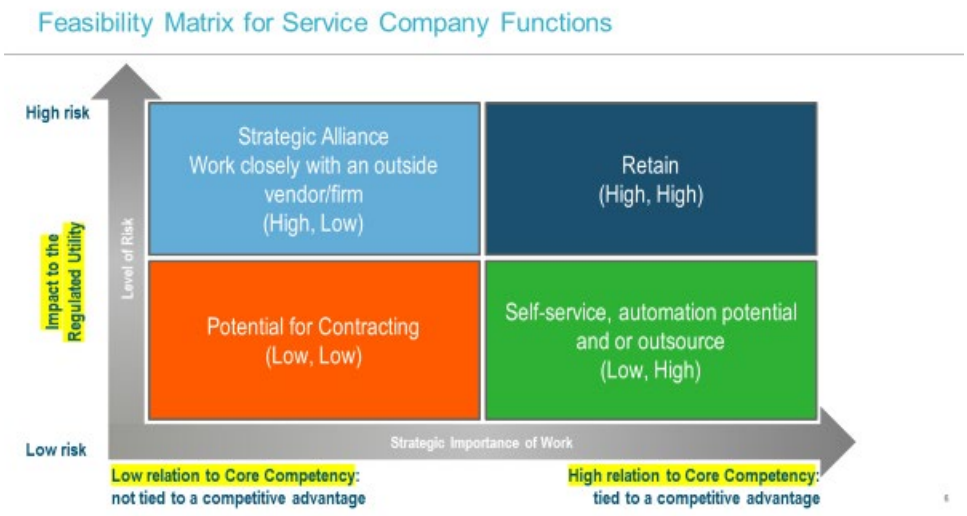
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   8

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   7



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Luis Abril

Job Title: Director

Organization/Department: Project Governance, Controls and Reporting

Telephone Number: 704 -382-4937

Email Address: luis.abril@duke-energy.com

Date Form was Completed:

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Human Resources

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function: See below:

2021 Duke Energy Market Study

Strategy, Planning and Management [Please do not edit; standard for all functions]	Business and Financial Planning and Reporting; Benefits Financial Planning; Enterprise Risk Register; Incident Management Planning and Implementation
Human Resource Consulting (Advice & Counsel, Business Partner, etc.)	Provide advice and counsel to the business units at varying levels. Requires an understanding of the business to provide advice that aligns with the business strategy. Consulting is tiered based upon senior level leadership but also HR consulting services for addressing questions from managers.
Labor & Employee Relations and Investigations	Responsible for overall company Labor Relations including contract negotiation and implementation, grievances, active work with business units to address union organizing activity, consultation on all union related questions. Responsible for overall company Employee Relations including HR policies and procedures, compliance with laws and regulations, and consulting on issues that may arise from legislation, etc. Responsible for Company Investigations related to employees as well as providing guidance to other inquiries and issues that may arise within the business.
Total Rewards (Health & Welfare, Retirement, Compensation)	Responsible for the design and build of company total reward programs. Includes program design, oversight of administration both internally and with third party administrations, employee communications, annual enrollment, benchmarking and competitive comparisons, modifications based on legislative changes, etc. Coordinates with Compensation Committee of BOD and Investment Committee.
Talent Acquisition	Responsible for the overal testing, selection, hiring, and onboarding processes for all new hires of the company. Includes working with the business relative to hiring needs and provision of qualified candidates. Includes campus recruiting.
Workforce Planning & Agility	Works with the business to identify short and long term workforce plans. Use for hiring forecasts, financial impacts, future skill needs, etc. Integrates with RUPE for presenting the upcoming plans to allow for modifications in plans as needed. Oversight of the Talent Marketplace and Gig Assignments.
Talent Management & Exec Development	Responsible for overall talent management and executive development including succession planning and readiness, career planning, coaching engagements, assessments and development plans, and planned updates with senior leadership and BOD.
Enterprise Leadership Development/Learning	Responsible for overall learning and development for both executives and employees. Includes design and implementation of programs, tracking and reporting, linking to company and business needs.
Diversity & Inclusion	SME accountability for overall planning, guidance, metrics and reporting, goals, and company expectations for all diversity and inclusion policies, practices, and programs. Business is responsible for specific programs for their areas including the completion of programs and metric improvement.
HR Technology & Operations (Payroll, Time Reporting, Workday, LMS)	Manages HR's primary operational services for both internal and third party work as well as functional accountability of operational systems. Core systems and Third Parties include Workday, MyLearning, MyTime, Alight. Primary processes include Payroll, time reporting, learning technology management, HR Data Analytics and Reporting, Data Security, Product upgrads and enhancements, and HR Support responses. Also includes contingent worker management.
Change Management	Provide change management expertise on enterprise level topics. Supports business as needed. Sets the overall approach and guidance for those who are change managers.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

HR leverages any studies that are conducted by the business as well as separate benchmarking reviews. Most current include:

- Enterprise Business Services review leveraging PWC
- HR Benchmark Review leveraging Saratoga/PWC data
- HR Benchmark Review leveraging EUHRG (industry) data
- Specific Center of Excellence studies, i.e. Total Rewards through third party vendors

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- HR Functional Comparison comparing to Saratoga/PWC
- Summary findings for Enterprise Business Services review

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

Level 5 Organization Description	Employees (EE)	Contingent Workers (CW)	# of EEs per CW
Div, Incl & Workforce Strat	4		0
HR, Employee& Labor Relations	39		0
HR, Executive Dev & Engagement	21	3	7
HR, Total Rewards & HR Ops	71	6	11.8
HR, Transformation & Emp Dev	84	1	84
Staff	6		0
Grand Total	**225**	**10**	**22.5**

6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:

8

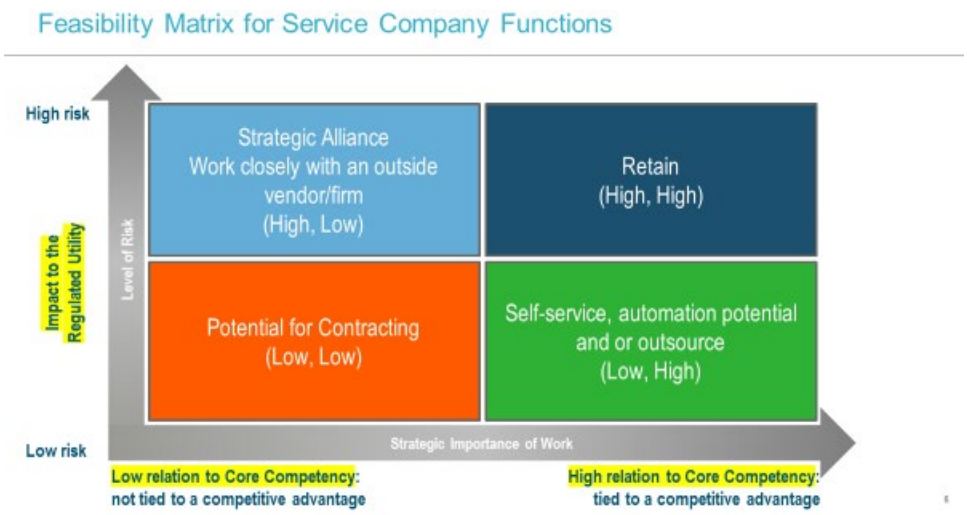
The overall impact of the HR function to the Regulated Utility is considered to be fairly high. The HR processes associated with union contract negotiations, grievances, etc. as well as compensation, benefit, payroll, and succession planning management and administration are important factors in cost and productivity to the Regulated Utility while corporate training, consulting, change management have slightly less impact/risk.

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:

7

The overall relationship of the HR function to the Enterprise Core Competency of producing power is considered to be moderately high. The HR processes associated with Labor Relations are fairly specialized and the compensation and succession planning management and administration are strategic providing competitive advantages.



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Khris Helms

Job Title: Manager HR Data and Reporting

Organization/Department: Human Resource/HR Integrated Product Management

Telephone Number: 704-519-8042

Email Address: Khris.Helms@Duke-Energy.com

Date Form was Completed: 4/1/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Human Resources Submission Form

Attachments Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

- **Use the drop-down list below to select the DEBS function for which you are attesting:**

  Information Systems

  If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

  Attesting for Information Technology (IT) & Customer Solutions

- **Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:**

  Information Technology is the Information Systems departments that provide for the general technology needs of the enterprise (including DEC, DEP and PNG) and specific technology needs of various functions and businesses. The Information Technology function provides services related to application delivery and support, infrastructure & operations, business/functional IT support (e.g. nuclear generation IT support), telecommunications, data analytics, digital and mobility. The Customer Solutions function provides support for the customer billing systems.

- **Provide a short narrative explaining how the service function performs a cost-benefit analysis:**

  Information Systems is focused on efficiencies and managing costs. The following are examples of efforts to ensure it is operating effectively and achieving cost savings where possible:

A) There is a philosophy of continuous improvement with process efficiency initiatives to transform our business and ensure cost effectiveness. Areas of focus include:

- Agile delivery to increase speed to delivery with Agile processes and capabilities. Using iterative feedback loops to deliver business value faster and incrementally.
- DevOps to improve the quality, speed and efficiency of IT Solutions and business value delivery.
- Lean processes to simplify, automate, reduce waste and eliminate non-value work in IT processes, allowing focus on high value activities.
- IT Sourcing Optimization to ensure competitive contract negotiations. There is a champion-challenger model and a Strategic Relationship Management program with IT strategic suppliers. IT and Supply Chain partner to manage strategic IT supplier relationships with a goal of more efficient and more effective spend across IT functions and other business units.
- Labor optimization with a focus on reskilling employees in new technologies and reducing reliance on contractors in critical roles.

B) The Enterprise's Purchasing Controls Policy

- Duke Energy acquires Information Systems services and products in a competitive and fair manner.
  - All purchases of goods, components, and services, during the normal course of business, which will or could be installed or performed on the Bulk Electric System (BES) cyber systems, regardless of the purchase amount, must be sourced through the Supply Chain organization. Supply Chain or Designated Sourcing Representatives will manage the Procurement process, which includes actions required for compliance with NERC CIP-013 Supply Chain Cybersecurity Risk Management.
  - Purchases of goods and/or services equal to or greater than $250,000 must be sourced through Supply Chain or Designated Sourcing Representatives (granted authority by the Chief Procurement Officer). The Supply Chain organization (or the Designated Sourcing Representative) will manage the Procurement process by actively selecting qualified bidders; developing the sourcing strategy; managing the bidding process; negotiating terms and conditions, pricing, and any other commercial provisions; and ensuring compliance with this policy.
  - Purchases of goods and/or services between $100,000 and $250,000 not involving Supply Chain or Designated Sourcing Representatives (granted authority by the Chief Procurement Officer) must have a purchase order, the appropriate Duke Energy standard Terms and Conditions documents and/or other Duke contractual documents issued by Supply Chain.
  - Purchases of goods and/or services up to $100,000 not involving Supply Chain or Designated Sourcing Representatives require the individual conducting the transaction to comply with this policy. All such transactions require approval by an officer of the company or someone who is granted approval authority by the Board of Directors, and has appropriate DOA limits. NOTE: Purchases of goods, components, and services which will or could be installed or performed on the Bulk Electric System (BES) cyber systems, must be sourced through Supply Chain as outlined above.

C) Organization changes within IT and Customer Information Systems

- Information Systems has restructured to create a leaner organization with greater spans of control, better resource flow, operational efficiencies, more flexible/simplified processes, and improved alignment of towers. Most recent reorganizations occurred as of April 1, 2021.

- **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

Duke is a member of Unite. Unite is an Information Technology benchmarking and best practices consortium of electric and gas utility companies. Members exchange operating cost metrics and best practice information to enable improvement in their information technology organizations and operations. Please see an attached report from the 2018 Benchmark for Infrastructure & Operations. <Attach 2018 file>

- **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**

Area	FTE	CW (Contract Services & Staff Augment CW)	Total	FTE %
Corp IT	1571	1532	3103	51%
Customer Solutions	115	185	300	38%

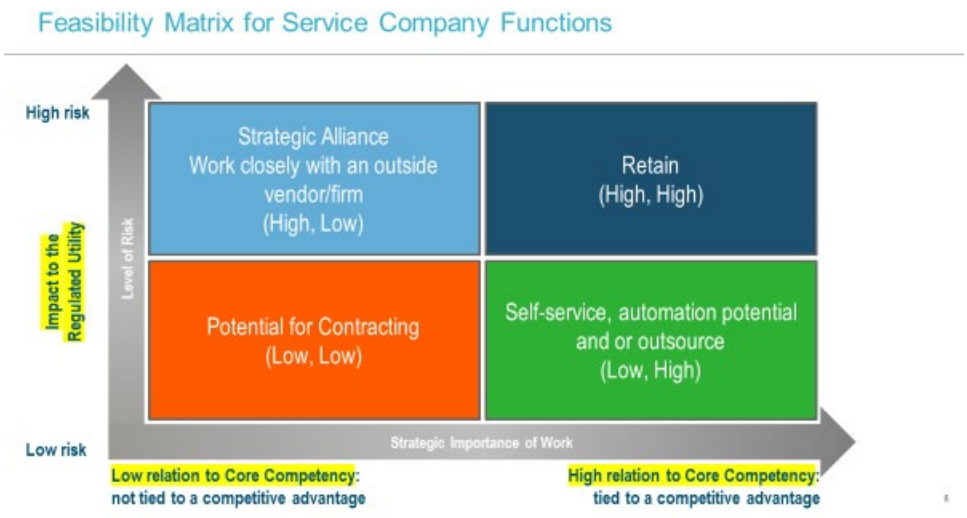
- **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

- ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

1-Low to 10-High:
10

- ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
7



- **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

DUKE ENERGY

2021 Duke Energy Market Study

Responder Name: Dana Rideout

Job Title: Director-IT Applications

Organization/Department: Information Technology

Telephone Number: 919-546-5036

Email Address: dana.rideout@duke-energy.com

Date Form was Completed: 3-29-21

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Information Systems Submission Form

Attachment Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:
DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to Joan De Vera ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Information Systems

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Attesting for Enterprise Cybersecurity. Note: In October 2016, Information Systems was restructured to create a leaner organization with greater spans of control, better resource flow, operational efficiencies, more flexible/simplified processes, and improved alignment of towers. Cybersecurity was moved under the Finance and Security organization.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Enterprise Cybersecurity supports the Enterprise Security mission by applying risk management principles to focus the services provided on decreasing vulnerabilities; increasing the effectiveness of protective controls; accelerating detection and response activities; while cultivating a security-conscious and compliant environment that enables transformation and growth.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Enterprise Cybersecurity is focused on efficiencies and managing costs. The following are examples of efforts to ensure it is operating effectively and achieving cost savings where possible:

A) There are governance processes for selecting investments in Enterprise Cybersecurity to ensure it is performing the required work for Duke Energy. It strives to ensure cybersecurity investments are targeted to deliver the best value to the enterprise and to facilitate business ownership of Cybersecurity investment decisions based on

enterprise priorities.

B) There have been Process Efficiency Initiatives, including:

- Contract negotiations and maintenance renewals
- Creation of the Cybersecurity Tool Inventory to manage cybersecurity investments and monitor upcoming contract renewals
- Application Sustainability – retirement of assets that are no longer in use

C) The Enterprise's Purchasing Controls Policy

- Duke Energy acquires Enterprise Cybersecurity services and products in a competitive and fair manner.

  Duke Energy has a Purchasing Controls Policy that defines the roles, responsibilities, and requirements related to the procurement process at Duke Energy Corporation and its subsidiaries. Specific topics addressed include required approvals, the sourcing process, contract formation, segregation of duties, and standards of business conduct.

  All purchases of Enterprise Cybersecurity goods and services for amounts greater than or equal to $100,000 must be sourced through the Supply Chain organization. The Supply Chain personnel manage the Procurement process by actively selecting qualified bidders; developing the sourcing strategy; managing the bidding process; benchmarking; negotiating terms and conditions, pricing, and any other commercial provisions.

  With limited exceptions, competitive bids are required for all purchases greater than or equal to $250,000. All exceptions must be documented and approved. On occasions, purchases are single sourced or sole sourced. A single source purchase occurs when a competitive bidding process is not undertaken and the decision is made to select a specific supplier based on technical, commercial, or other valid business reasons. Single Source purchases must be supported by documentation explaining the rationale and requires joint approval by a Vice President or their designee and Supply Chain. Sole source purchases must be approved by Supply Chain in accordance with their Delegation of Authority limits.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

See response to #3

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

	As of February 28, 2021			
	Total Headcount	FTEs	Contractor Workers (Contract Services & Staff Augment)	% FTE
Cybersecurity	275	125	150	45%

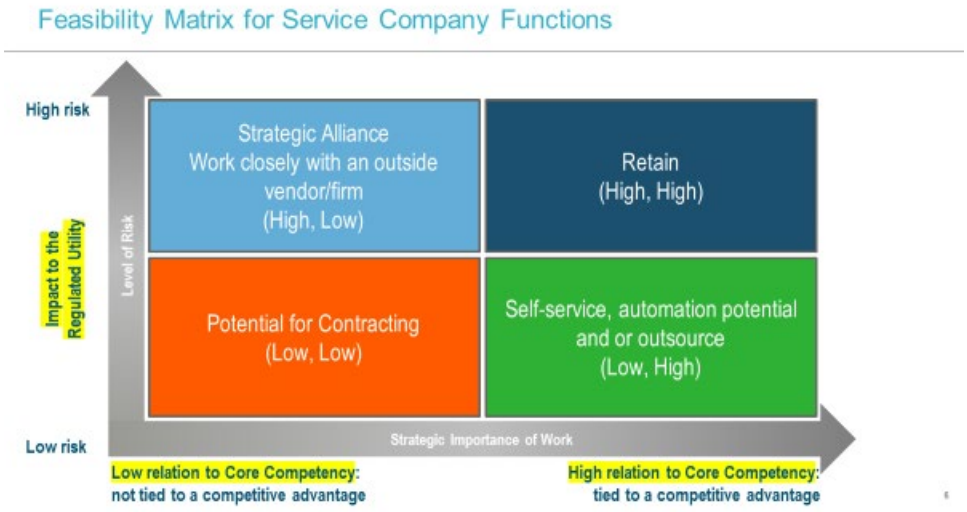
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)

1-Low to 10-High:
6



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name:	Dennis Gilbert, Jr.
Job Title:	VP, Chief Information Security Officer
Organization/Department:	Enterprise Cybersecurity
Telephone Number:	704-382-3818
Email Address:	Dennis.Gilbert@duke-energy.com
Date Form was Completed:	3/31/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to Joan De Vera ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Internal Auditing

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

NA

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

The objective of the Corporate Audit Services Department is to determine whether the organization's network of risk management, control, and governance processes, as designed and represented by management, is adequate and functioning properly. To accomplish this objective, the Corporate Audit Services Department will:

- Examine and evaluate the adequacy of the design, documentation, and effectiveness of the internal control system, as defined below, throughout Duke Energy, including its subsidiary business units and affiliates, and the quality of performance in carrying out assigned control responsibilities
- Assist management in the assessment of business risks and in the identification of cost beneficial modifications of internal controls to mitigate risks, including potential fraud, to acceptable levels
- Assist management in providing reasonable assurance that Duke Energy's objectives and goals will be met efficiently and economically
- Interact with various Duke Energy governance groups as required
- Evaluate the means of safeguarding assets and, as appropriate, verify their existence
- Review compliance with established laws, regulations, and policies and procedures, as appropriate
- Conduct selected special audits and consulting projects at the request of management, as appropriate, or the Audit Committee

- Communicate opportunities for improving management control, profitability, and the organization's image to the appropriate level of management and to the Audit Committee
- Follow-up on outstanding audit matters and significant deficiencies/material weaknesses to validate that these issues are being resolved appropriately and timely

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

- The loaded cost of providing internal audit services internally is approximately $95/hour, while the weighted cost (between IT and Financial auditors) based on most recent invoices is approximately $119 an hour. See attached spreadsheet showing calculation.
- As an additional datapoint, Duke Energy participates annually in the EEI/AGA Internal Audit Survey. In the most recent survey, on a Revenue Per Auditor basis, Duke ranks 3rd most efficient among the 45 electric or combination utilities that participated.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- 2021 Cost/Benefit Analysis, representative bills/statements of work from Dixon Hughes, E&Y, PWC and KPMG – partially confidential

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Typically, will use contingent workers on a case by case basis as needed for staff augmentation of specific skill needs.
- Currently using staff augmentation to bridge temporarily until find candidates for open positions. Current ratio is 88% employee/12% staff augmentation.

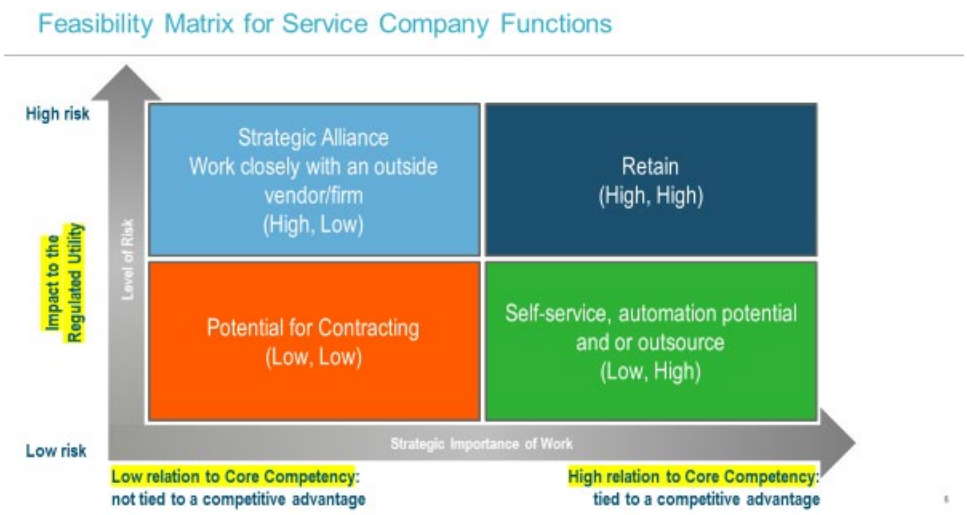
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
7

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
5



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Amy Hunter

Job Title: VP – Corporate Audit Services

Organization/Department: Corporate Audit Services

Telephone Number: (704) 382-3896

Email Address: Amy.hunter@duke-energy.com

Date Form was Completed: 3/31/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Internal Auditing Submission Form

Attachment Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Investor Relations

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Investor Relations/Shareholder Services

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

- Shareholder Services - Serves as enterprise's (including DEC's and DEP's) in-house stock transfer agent, dividend paying agent, and registrar. Handles all stock transfer work and communications with individual investors for DUK common stock.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Periodically completes outsourcing review of Shareholder Services. Last extensive review was completed in 2013. Management has performed a SWOT analysis and implemented efficiencies. Major efficiencies include a new automated voice response system for incoming investor calls and upgraded on-line shareholder platform.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a

market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- SWOT Analysis Shareholder Services

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 14 total head count (11 FTE and 3 CWs), 78% FTE

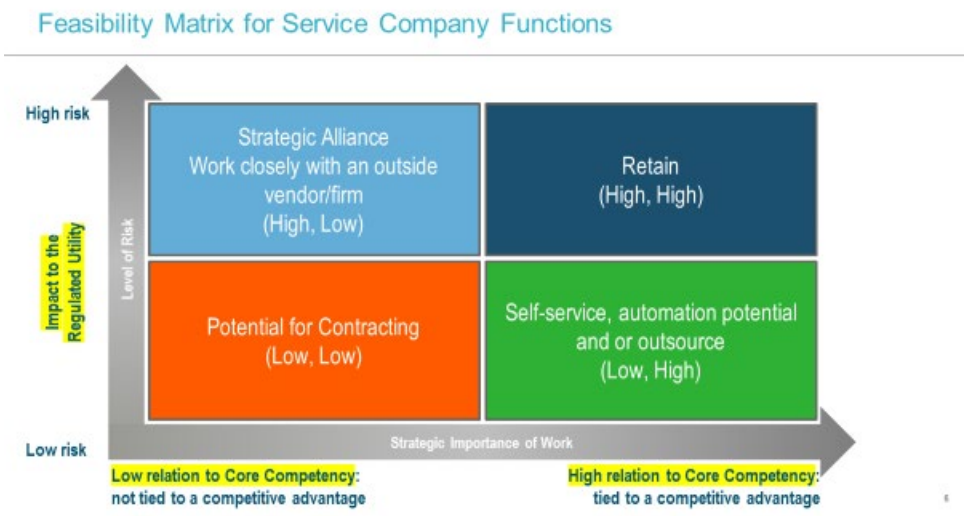
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
6

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
5



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Joe Crapster

Job Title: Director, Shareholder Services

Organization/Department: Finance/Investor Relations/Shareholder Services

Telephone Number:

704-382-5290

Email Address: joseph.crapster@duke-energy.com

Date Form was Completed: 3/20/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Investor Relations Submission Form

Attachment Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Legal

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

N/A

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Renders services relating to labor and employment law, litigation, contracts, rates and regulatory affairs, environmental matters, financing, financial reporting, real estate and other legal matters.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Attorneys within the legal department often engage outside counsel for assistance on DEC's, DEP's and PNG's legal matters. Reasons for engagement range from little to no capacity to take on new legal assignments to a requirement for specialized knowledge or expertise of outside counsel for a particular matter.

In 2014, the Department implemented an outside counsel strategy designed to limit the number outside counsel law firms engaged by the department, reduce outside counsel costs, and create a uniform manner by which Duke Energy engages outside counsel. This effort was further refined and enhanced in 2020 with a full outside counsel RFP process. This accomplished a reduction in firms to reduce costs without

sacrificing the quality of legal counsel the company was receiving and resulted in the Duke Energy Legal Alliance (DELA).

The DELA consists of 12 full service law firms, 22 niche law firms to be used for specific, designated work scope and 25 diversity firms.

Additionally, the outside counsel strategy team, including the Chief Legal Officer and Legal SVP/VPs, meet regularly to discuss and review outside counsel spend, any DELA exceptions and to track progress towards Legal's outside counsel spend goals and other metrics.

For 2020, the department's goals were:

- 80% of new matters assigned to DELA law firms
- 100% of DELA exceptions must be pre-approved by the Legal SVP/VP

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

2020 Duke Energy Legal Alliance Strategy.pdf

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 141 FTEs (as of 2/28/2021)
- 1 CW
- <1%

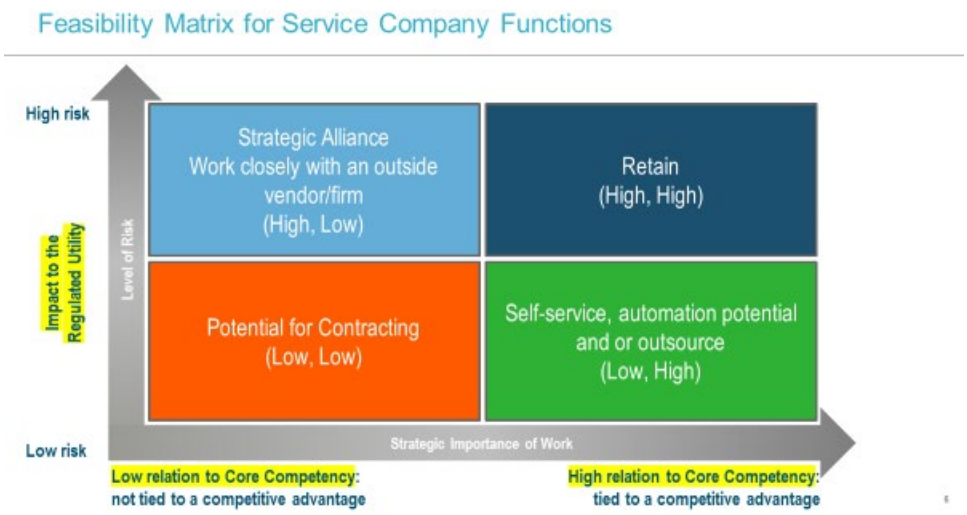
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
9

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
5



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name:	**Katie Sanderson**
Job Title:	**Manager, Legal Analytics and System Support**
Organization/Department:	**Legal**
Telephone Number:	**980-373-0482**
Email Address:	**katie.sanderson@duke.energy.com**
Date Form was Completed:	**3/24/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Legal Submission Form

Attachment Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Planning

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Enterprise Strategy and Planning

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:
Facilitation of enterprise planning and strategic plan preparation; operational integration of the Regulated Utility strategy; monitoring of industry trends; and evaluation of business opportunities.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:
The functions provided by DEBS Planning staff are strategic in nature to the organization. Duke Energy management has determined that outsourcing functional support for critical Planning services is not judged appropriate due to the proprietary and confidential nature of strategic planning, detailed and historical knowledge of the business, and internal knowledge of complex regulatory issues. Moreover, Duke Energy utility customers ultimately benefit from dedicated, internal strategic planning resources. However, on an 'as needed' basis, the Company engages external consultants and subject matter experts as appropriate to supplement our internal staff capabilities. The decision to engage an outside provider is based on specific skill requirements and experience of individual consultants.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- N/A

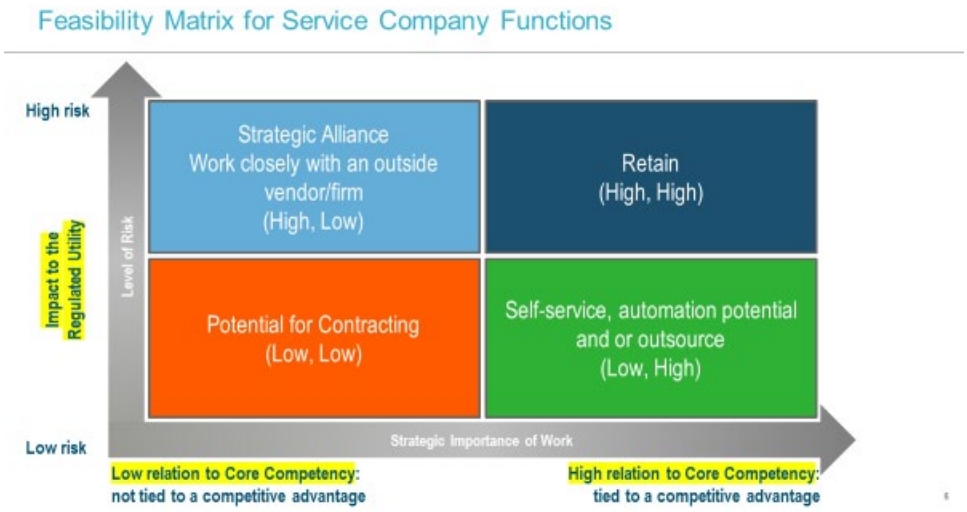
5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - 4 FTE's: 0 CWs
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   7

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   10



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Christy Daniel

Job Title: Managing Director

Organization/Department: Enterprise Strategy and Planning

Telephone Number: 704-382-5541

Email Address: Christy.daniel@duke-energy.com

Date Form was Completed: 3/15/21

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Power Engineering and Construction

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Project Management and Construction (PMC) develops and executes major projects (typically new generation plants or major plant/dam modifications) on behalf of DEC/DEP that are part of the DEC/DEP operated generation assets. Currently 9 DEC/DEP projects in construction and/or commissioning total approximately $1 billion in total project capex.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

This service cannot be outsourced; accordingly, a cost-benefit analysis is not required. Only 3-7% of the cost of these major projects is for PMC services. PMC does competitively bid out to third parties and contracts for the remaining 93-97% of the DEC/DEP major project costs that includes supply of major equipment, engineering, procurement and construction (EPC) services.

PMC services are required to develop site, technology, scope, permit, specifications, and contract these major projects for DEC/DEP and provide project controls and project management oversight to ensure

DEC/DEP standards and requirements for O&M, reliability, efficiency, safety, environment, quality, cost and schedule are met. This is a critical strategic service that requires owner/operator knowledge, experience and expertise that cannot be effectively outsourced.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- NA

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 55 Employees and 25 Contingent Workers (mostly site construction/EHS oversight). Note these PMC resources also provide project services to other Duke Energy regulated businesses in the Midwest and Florida.

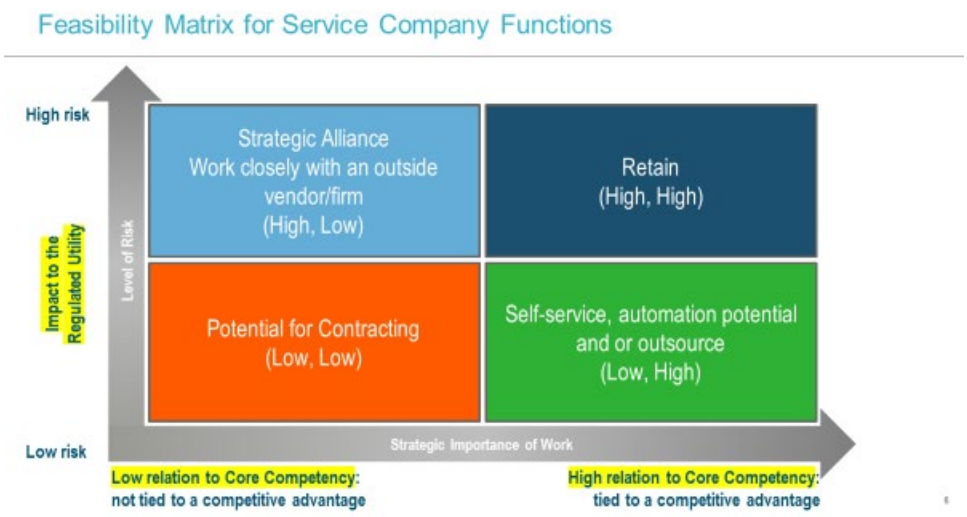
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
10



7) Point of contact for the Service Function ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name:

Mark Landseidel

Job Title:

GM Project Development

Organization/Department:

Project Management & Construction (PMC)

Telephone Number:

704 507 7471

Email Address:

Mark.Landseidel@duke-energy.com

Date Form was Completed:

4/2/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Power Engineering and Construction

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Natural Gas Major Projects (NGMP)

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

NGMP executes projects (typically high-pressure steel infrastructure) to meet Natural Gas customer demand, system reliability and system integrity requirements. Currently 264 projects in design or construction with approximately $2.7 billion in total project capex in flight.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

This service cannot be outsourced; accordingly, a cost-benefit analysis is not required. Less than 5% of the cost of these projects is for NGMP services. Approximately 95% of the major project costs are competitively bid which includes engineering design, material, construction and inspection.

NGMP services are required to plan and contract projects for NGBU and provide project management, control and oversight to ensure NGBU standards for safety, environment, quality, cost and schedule are met. This is a critical strategic service that requires experience and expertise that cannot be effectively outsourced.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- NA

5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - 58 Employees (58%) and 42 Contingent Workers (42%)

6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

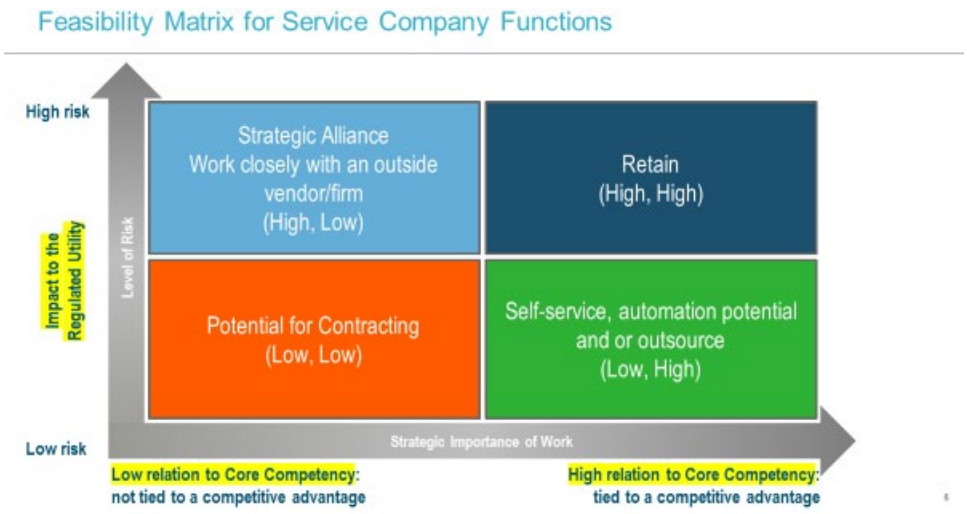
   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   10

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   NGMP Function is highly specialized

   1-Low to 10-High:
   10



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name:	Greg Hazlett
Job Title:	Director, Project Controls

2021 Duke Energy Market Study

Organization/Department:	Natural Gas Major Projects
Telephone Number:	704-731-4559
Email Address:	greg.hazlett@duke-energy.com
Date Form was Completed:	3/23/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Power Planning and Operations

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

- Strategic Programs (i.e., Program Development)
- Business Services, Workforce Strategy, & Risk
- Engineering Services
- Document Control / Configuration Management
- Technical Applications
- NERC Compliance
- Generation & Regulatory Strategy

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

The Central Operational Services & Oversight (COSO) organization manages the functions noted above for the Regulated & Renewable Energy (RRE) organization (formerly known as Fossil-Hydro Operations, FHO). COSO provides the technical expertise necessary to achieve Duke Energy's mission of providing safe, compliant, and increasingly clean energy, reliably for our customers.

From a functional perspective, COSO is responsible for establishing strategies for meeting regulatory obligations; this includes the development of programs necessary for compliance, along with the governance and oversight of those programs. Additionally, this organization also provides leadership and oversight of long term strategic and reliability initiatives, and maintains the technical design basis for the RRE fleet.

Additionally, COSO provides application consultation, training, functional fix/break support, business testing, change management, governance, enhancements, upgrades, business case development, vendor & information technology consultation/liaison, and assistance/questions for centralized applications within RRE.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Given that COSO serves in a strategic and oversight role, these services are generally not available from an outside entity. It is not reasonable to rely on an outside entity for overseeing these functions as COSO is essentially responsible for providing sound stewardship of RRE's resources and assets.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- N/A

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Count of FTEs / Count of CWs = 4.01 ratio (361 total / 271 Duke E90), or 401%. It should be noted that this percentage varies depending upon what is being worked on at any given point in time.

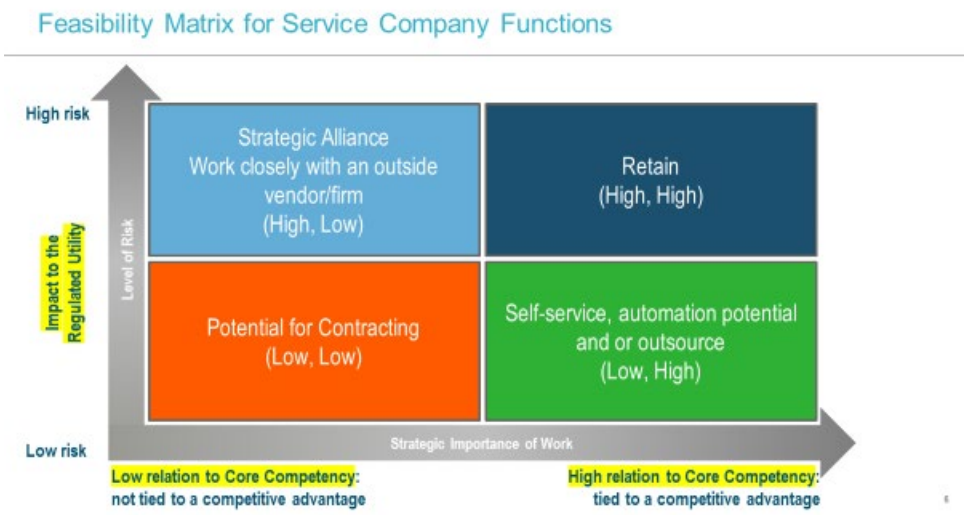
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
10



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Bryan P. Walsh, P.E.

Job Title: Vice President, RRE Central Operational Services & Oversight

Organization/Department: Regulated & Renewable Energy (RRE)

Telephone Number: Cell - 980.722.8066

Email Address: bryan.walsh@duke-energy.com

Date Form was Completed: 3/30/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Public Affairs

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Corporate Communications

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Preparation and dissemination of information to employees, customers, government officials, community leaders, customers, interested stakeholders, investors and the media; provision of associated communications materials and advertising. Responsibility for the corporation's emergency planning and communications to the public related to physical or cyber security threats or incidents, major storms and other operational and reputational crises. Additionally, responsible for strategic communications planning and execution around customer issues including rate adjustments, customer services, outages, investments in the grid and the changing power generation mix. Finally, the function supports communications for the Duke Energy Foundation, community affairs, environmental affairs, stakeholder engagement, governmental relations, sustainability and ESG (Environment, Social and Governance) issues.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Corporate Communications has participated in benchmark studies with industry peers and other professional organizations. In addition, the company occasionally seeks outside firms to assist us with specific initiatives, providing a good view into current market pricing.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- No significant studies performed in the last four years.

5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**

- Corporate Communications has 107 full time employees plus 9 contingent workers. Contingent workers make up 7.8% of the total Corp. Comm. staff.

6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

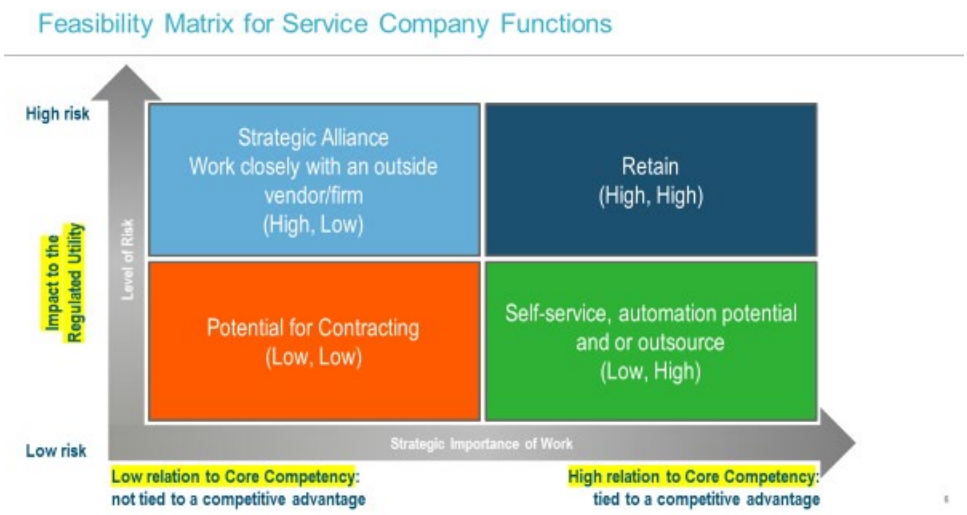
1-Low to 10-High:
10

Corporate Communications services impact to the organization is high. The organization fills many regulatory and public safety roles.

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
9

Most functions are highly specialized and require deep organizational knowledge not attainable by outside contractors. In addition, certain roles are highly strategic or sensitive and cannot be outsourced.



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Paige Sheehan

Job Title: Director of Communications Training and Special Projects

Organization/Department: Corporate Communications

Telephone Number:704-382-6982

Email Address: paige.sheehans@duke-energy.com

Date Form was Completed: 3/18/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Public Affairs

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

External Affairs and Strategic Planning

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Preparation and dissemination of information to employees, customers, government official, communities, and the media; provision of associated communications materials. Overall responsibility for the corporation's emergency planning communications, including facilities and reputational risks and communication planning and implementation as it relates to major storms and other operational and reputational crises. Additionally, responsible for strategic planning and execution for the Duke Energy Foundation, community affairs, environmental affairs, stakeholder engagement, governmental relations and sustainability.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

External Affairs and Strategic Planning has participated in benchmark studies with industry peers and other professional organizations.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a

market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- No significant studies performed in the past 4 years.

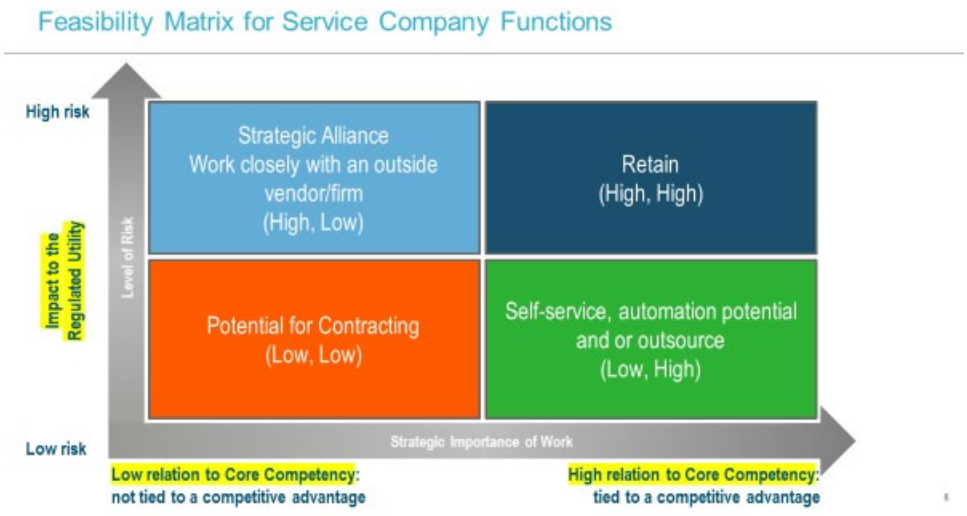
5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - 38 FTE. 1 CW ---- 3%
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   10
   External Affairs and Strategic Planning services impact to the organization is high. The organization fills many policy, regulatory, and public safety roles.

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   9
   Most functions are highly specialized and require deep organizational knowledge not attainable by outside contractors. In addition, certain roles are highly strategic or sensitive and cannot be outsourced.



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: **Jonathan Miller**

DUKE ENERGY

2021 Duke Energy Market Study

Job Title:	**Operations & Finance Manager**
Organization/Department:	**FGCA: Strategic Integration & Foundation**
Telephone Number:	**980-373-8711**
Email Address:	**jonathan.miller@duke-energy.com**
Date Form was Completed:	**4/6/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Rate Design and Analysis

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

- Rate Design and Analysis provides rate analysis, rate design, tariff administration, customer inquiry support, and rate policy oversight for all retail rates (including residential, general service, large customer service, and real-time pricing). The team ensures rates are designed appropriate to recover the revenues allowed by the NCUC, both for base rates and tariffs for fuel and other programs. Also, the team works to ensure rates are designed to charge customers appropriately for the costs they impose on the system – in short, that customers who cost more to serve actually pay more. The team regularly interacts with the NCUC through testimony, the Public Staff, as well as other stakeholders. In such meetings the team represents the interests and positions of DEC and DEP. (We do not provide rate support for PNG in the Carolinas.) Finally, the team performs support and oversight for development and filing of renewable rates, programs, and offers for retail customers.
- Regulated Solution Analytics includes Load Research analysis on customer load and Energy Efficiency / Demand Side Management (EE/DSM) analytics services to DEC and DEP. Such services allow for improved load forecasting, a critical part of both resource planning and operational planning for the utilities. Also, load research supports the ratemaking process described above. EE/DSM analytics identify and measure the cost-effectiveness of energy efficiency and demand response programs the utilities offer to retail customers. For example, the amount of rebates provided for specific EE measures are valued by the Load Research team. In addition, EE/DSM analytics

provides energy efficiency forecasting, market potential studies, and IRP support to plan the future growth of our programs.

- Renewable and Wholesale analytics supports large customer contract structuring/valuation for DEC/DEP and DEI. Resource RFP's are managed through this team, including both renewable and non-renewable resources and covering both capacity and energy. The analytics work supports IRP filings, CPCN applications, and numerous other commission proceedings such as avoided costs and purchased power. Wholesale analytics structures all wholesale contracts to ensure proper levels of revenue and cost coverage are received from wholesale customers. The team supports deal structuring and negotiations, as appropriate.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Rate design analysis, Load Research, and Renewable/Wholesale analytics do not routinely perform a cost-benefit analysis relative to their functions. Expertise is highly specific, and an extensive knowledge base of company and regulatory history / processes is necessary to properly represent the company. Outside consultants are used rarely in special cases. In such cases, the cost of outside expertise usually is at multiples of internal employees.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- N/A

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Rate Design and Analysis: There are 15 FTE's and 0 CW's in the Rate Design and Analysis function. The team supports rate design and analysis across all 6 states (retail electric footprint), and some resources are primarily dedicated to specific jurisdictions.
- Regulated Solution Analytics: There are 15 FTE's and 1 CW's in Regulated Solution Analytics. The team support all 6 states and load research for the Natural Gas Business Unit. Some resources are primarily dedicated to specific jurisdictions.
- Renewable and Wholesale Analytics: There are 6 FTE'S AND 0 CW in Renewable and Wholesale Analytics. The team supports all 6 states.
- Organizational Total: 1 FTE leading the 3 groups above as VP of Rate Design and Strategic Solutions, for a total organizational count of 37 FTEs and 1 CW.

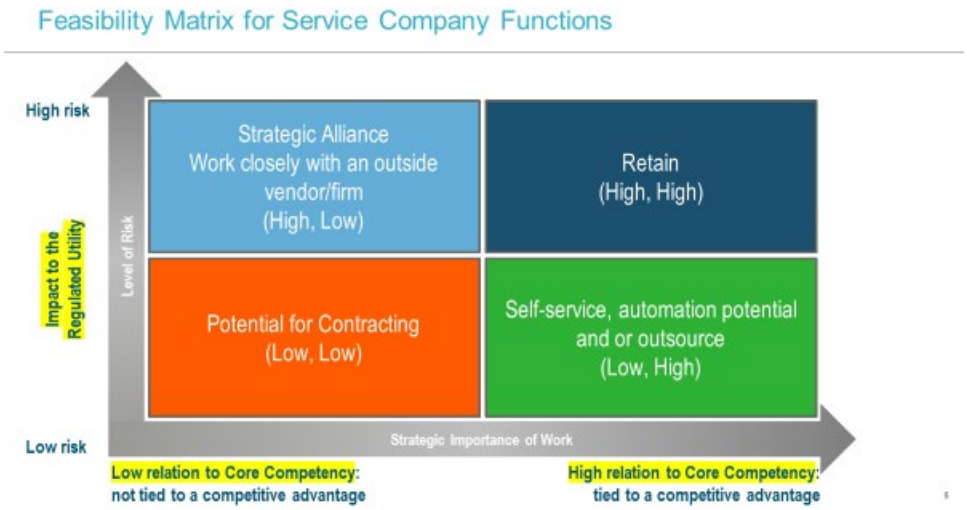
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
9

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
9



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name:	**Lon Huber**
Job Title:	**VP Rate Design and Strategic Solutions**
Organization/Department:	**Customer Solutions and Strategies**
Telephone Number:	**928-380-5540**
Email Address:	**Lon.Huber@duke-energy.com**
Date Form was Completed:	**4/1/2021**

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Rate Design and Analysis

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

The PNG rates and regulatory strategy team's responsibilities include the development, analysis, and administration of all regulated pricing and rate design for PNG. This team develops, negotiates, seeks approval of, and implements tariff rates that recover the proper level of revenue to ensure an adequate return to investors and to respond to competitive pressures. This team collaborates with and supports management in meeting the Company's strategic objectives. This team is also responsible for developing and representing the Company's position on pricing and rate design before customers, customer group representatives, trade organizations, and regulators as well as negotiating rates and related issues with customers, consultants, and regulators and successfully concluding proceedings before the regulatory commissions. This team studies the rates, revenues, and customer data to assess the effectiveness of the Company's authorized rates and tariffs and develops proposals to change the Company's existing rates and tariffs to accommodate the future strategic initiatives of the Company.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

The PNG rates and regulatory strategy team does not routinely perform a cost-benefit analysis relative to its role. The

expertise for this function is highly specific and requires extensive internal knowledge of the Company to properly represent and support the Company's position on regulatory matters. Outside consultants are used only in special circumstances and at a cost higher than that of internal employees.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- n/a

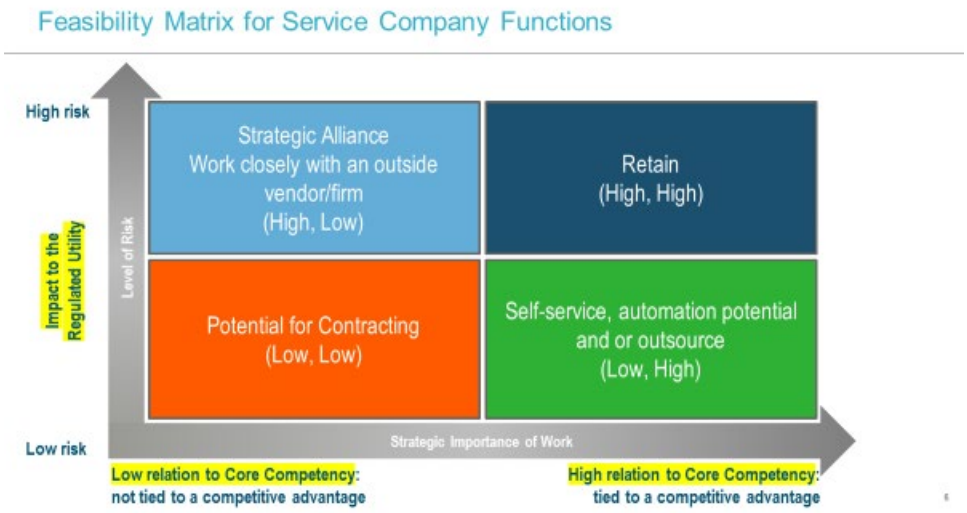
5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - Total Count 9; FTE 9; CW 0; Ratio 100%
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   9

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   9



7) **Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Kally Couzens

Job Title: Manager – Rates & Regulatory Strategy

Organization/Department: PNG Rates and Regulatory

Telephone Number: 704-731-4619

Email Address: kally.couzens@duke-energy.com

Date Form was Completed: 4/1/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Rights of Way

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

NA

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Land Services provides fee and non-fee land right support for regulated and non-regulated business units for placement of facilities to support pipes, wires, generation and renewable business. Including deeds, easements, licenses, leases, LIDAR survey, route survey, dam deformation support, ALTA survey, and research and indexing of land rights.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Professional organizations like Southeastern Electric Exchange (SEE), International Right of Way Association (IRWA), and Midwest Utility Real Estate Manager Meetings meet annually to review organizational structure, use of metrics, and best practices in the utility industry. Through Supply Sourcing group, Land Services reviews supplier services as well as survey vendors to compare costs with contractors.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- Right of Way Vendor RFP through Supply Sourcing

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 98 FTE – 4 CW – 4% Employee count encompasses all FTEs in Land Services that support electric/gas Distribution and Transmission activities along with transactions supporting all Duke Energy business Units. The 4 CWs are Staff Aug that support Land Services items as well. There are day to day activities and task that are handled by vendors with FTEs having oversight to the work/tasks. The number of employees by vendor can vary based on workload.

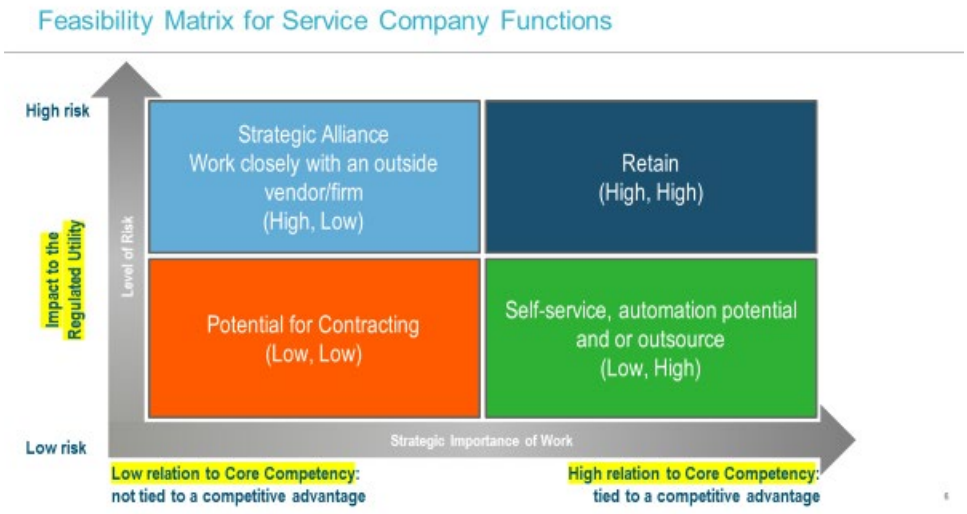
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
7

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
7



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Eric Rouse / Eric Rathburn

Job Title: Director, Land Services Carolinas & Gas / Director, Land Services MW & FL

Organization/Department: Land Services / Administrative Services

Telephone Number: 919-616-3028 / ???-???-????

Email Address: eric.rouse@duke-energy.com / eric.rathburn@duke-energy.com

Date Form was Completed: 26 March 2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to ***Joan De Vera*** ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Supply Chain

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Click here to enter text.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Supply Chain provides essential services and measurable value for Duke Energy Business Units and Duke Energy Corporation's affiliates through a highly skilled and engaged team focused on strategically sourcing value-based contracts; excellence in materials management, warehousing, and trucking and logistics; automated accounts payable functions; and efficient commercial processes. The Supply Chain organization provides services for:

- Procurement of goods and services;
- Category management of large specialized segments of spend, which includes strategic sourcing, supplier engagement, and contract management;
- Warehouse operations of distribution centers, operation centers, and plant storerooms;
- Inventory management;
- Accounts Payable; and
- Supplier engagement and diversity

The Sourcing organization is aligned with operational groups of Transmission and Customer Delivery, Generation, Gas Operations including Piedmont Natural Gas, Strategic Projects, and Enterprise. Focus is

placed on hiring local and diverse suppliers and Duke Energy implemented Hire NC in July 2020.

Supply Chain Operations services include trucking and logistics, warehousing, inventory management and materials management services such as repair of oil filled equipment and asset recovery. These services are provided to Duke regulated businesses across all jurisdictions in support of regular operations and maintenance activities, capital growth programs, special projects and emergency response.

The Accounts Payable organization provides services to all regulated businesses across all jurisdictions as well as supporting some Commercial business units.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

The supply chain organization routinely performs benchmarking on our operating costs and value generated. Annual benchmarking initiatives include participation in the Like Sized Utility Benchmarking study. This study includes 10-12 similarly sized Investor Owned Electric and Gas Utilities. Participants include Exelon, Dominion; NextEra, ConEdison, SoCal Edison, Southern Company, among others. Metrics that are used for comparison include: Sourcing cost as a percent of total utility's managed spend, sourcing cost as a percent of managed spend by business unit, total warehouse cost per line item for total utility, and cost per invoice processed. (See Attachments A and B.)

Third party providers are evaluated as part of competitive solicitation processes in accordance with the Company's sourcing standards, and their proposals are also compared against the internal cost to provide the service. These analyses enable Supply Chain Operations to validate if the internal costs are cost competitive and meet the Business Unit requirements for quality and reliability. (See Attachments C and D.)

In summary, Supply Chain leverages its relationship with peers and suppliers to stay informed about trends in the marketplace to ensure it delivers value add services in line with market trends.

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

- Attachment A LikeSizeUtilities2020 - MasterMetricReport - partially confidential
- Attachment B LikeSizeUtilities2020 - 3 Year Trend By Company # – partially confidential
- Attachment C Analysis Data for Jingoli – partially confidential
- Attachment D Analysis Data for ACT – partially confidential

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- 988 total Supply Chain headcount
- 78% employee (770 employees)
- 22% contingent worker (218 contingent workers)

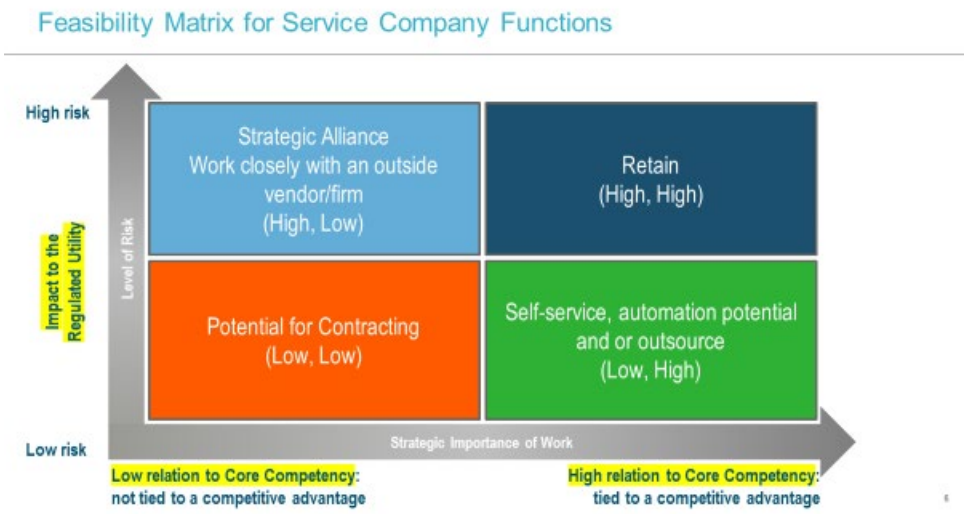
6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)

1-Low to 10-High:
10

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

1-Low to 10-High:
10



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name: Ruth Campbell

Job Title: Director, Supply Chain Policy and Controls

Organization/Department: Supply Chain Business Support

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Ruth.Campbell@duke-energy.com

Date Form was Completed:
4/1/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Supply Chain Submission Form

Attachments Filed under Seal

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to Joan De Vera ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Transportation

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

Aviation Services

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Corporate Aviation:
Corporate Aviation provides air transportation for company personnel with a fleet of three fixed wing aircraft and one helicopter. The use of one company aircraft allows eight passengers to attend meetings in multiple cities in a day, saving time while increasing their productivity.

Utility Aviation:
Additionally, Duke Energy operates five utility helicopters that are used to survey, inspect and patrol the transmission lines twice a year on a scheduled basis. Aerial patrols for methane detection are also flown quarterly across gas transmission assets. When not patrolling on a scheduled basis, the helicopters are used to assess damage after storms or for any other function that directly supports the reliability of the electrical grid in Duke Energy territories.

Unmanned Aerial Systems (UAS also known as drones):
The newest group in Aviation Services. This organization has taken new technology (the drone) and developed many use cases to support asset inspections across every major line of business in a method that reduces costs, enhances awareness of asset health, and reduces operational risk of our employees working with these assets. The UAS technology is used both

indoors (within powerplants) and outdoors over company assets. This group also trains other employees across the company to use the drone as another tool in their toolbox to extract the value articulated above.

3) **Provide a short narrative explaining how the service function performs a cost-benefit analysis:**

Duke Energy *Corporate Aviation* uses industry leader, Conklin & deDecker (https://conklindedecker.jetsupport.com/)for benchmarking data. The mission of Conklin & de Decker is to enable the general aviation industry to make more informed decisions when dealing with the operation of aircraft by furnishing objective and impartial information. Additionally, use of Supply Chain and third-party consultants to evaluate market alternatives is a common exercise to ensure internal costs are appropriate.

Duke Energy *Utility Aviation* and *Unmanned Aerial Systems* solicits quotes from third party contractors to benchmark internal costs with contractors.

4) **Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):**

- Please see reference above.

5) **Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):**
   - 31 FTE. 6 CW (part-time). 19.354839%
6) **Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:**

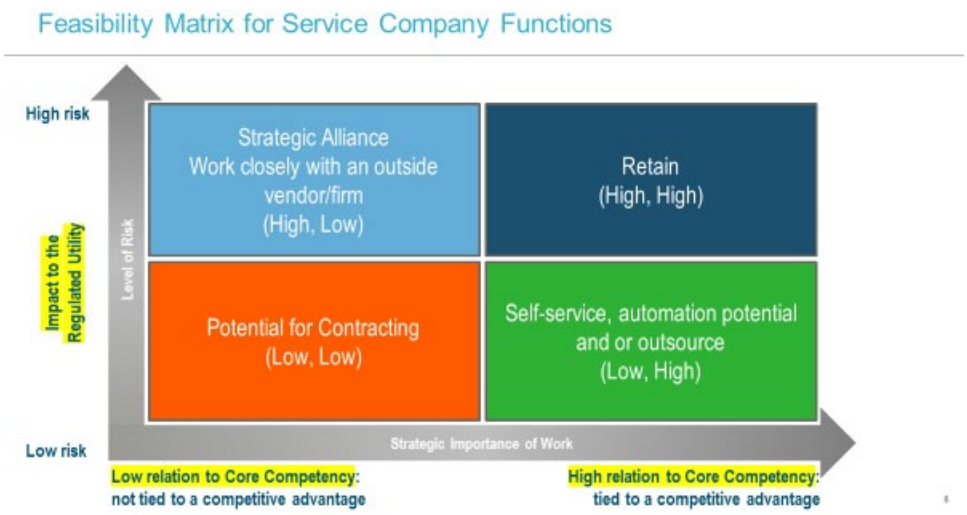
   a) ***Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)***

   1-Low to 10-High:
   7
   Utility Aviation impact is high/7:line patrol is a regulatory requirement and storm damage assessment is critical.

   Corporate Aviation impact is moderate/5

   b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***

   1-Low to 10-High:
   7
   All aviation function is highly specialized and expensive for outside contractors.



7) **Point of contact for the Service Function** ***(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):***

Responder Name: Jacob Velky

Job Title: Director Aircraft Operations

Organization/Department: Aviation Services

Telephone Number: 704-382-2115

Email Address: jacob.velky@duke-energy.com

Date Form was Completed:03/30/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

2021 Duke Energy Market Study

2021 Market Study Evidence Submission Form

Applicability: Duke Energy Business Services (DEBS), Duke Energy Carolinas (DEC), Duke Energy Progress (DEP), Piedmont Natural Gas (PNG)

Originator: Corporate Compliance, Ethics and Compliance, Joan De Vera

Due Date: 4/2/21

Applicable Regulatory Condition:

DOCKET NO. E-2, SUB 1095A
DOCKET NO. E-7, SUB 1100A
DOCKET NO. G-9, SUB 682A

5.2 Procurement or Provision of Goods and Services by DEC, DEP, PNG to or from Affiliates or Nonpublic Utility Operations.

Please populate and submit this form along with all evidence documentation to Joan De Vera ***by April 2, 2021.***

1) Use the drop-down list below to select the DEBS function for which you are attesting:

Transportation

If attesting only for a specific area within a function (i.e. CIS IT Support), please list below:

This document covers all areas of Fleet Services with the exception of Piedmont Natural Gas.

2) Provide a description of the function and the service offerings provided to DEC/DEP/PNG by the function:

Fleet Services provides operational and strategic leadership for all transportation and mobile equipment at Duke Energy. The scope of this function includes approximately 15,400 vehicles and pieces of equipment for all of Duke Energy. Of that number, over 12,000 are licensed, on-highway units with approximately 6,300 of them located in the DEC/DEP territory. Fleet Services scope includes the following:

- Maintenance and repair services
- Acquisition, financing, and disposal
- Corporate fleet policies
- Parts and contract management
- Fuel card programs
- Licensing and registration
- Compliance and sustainability strategies

These services are provided through a centralized organization with local representation and support at each jurisdiction. Fleet Services has a centralized general operations staff which provides governance and strategic direction on acquisitions, standards, contracts and fleet policies. This ensures a consistent

strategic direction across all jurisdictions, facilitates implementation of best practices, and allows Duke Energy to achieve efficiencies through standardization and economies of scale. Maintenance and repair services are provided through an operations organization that is regionally based to provide the field presence necessary to support utility operations. Actual services are provided through a combination of local garages and outsource providers based on business needs and value.

Fleet Services operations team focuses primarily on transportation and specialized equipment that is core to utility operations. Support for standard equipment and repair activities that are not cost effective to provide in-house are outsourced and centrally managed to ensure it is leveraging economies of scale. Examples of functions and work that are currently outsourced include the following: body work, glass replacement, transmission re-builds and repairs, hydraulic cylinder repairs, most tire work as well as some heavy construction and light-duty vehicles repairs.

Duke Energy Fleet Services is always looking for opportunities where outsourcing provides value based on cost and criticality to utility operations. Fleet Services' in-house resources are primarily focused on utility buckets, derricks, transportation and other equipment that is critical to support the grid and timely restoration efforts. By having in-house resources to support utility equipment, it can provide the specialized support required during storm restoration and reduce lead time associated with maintenance and repair services for buckets and derricks. This is accomplished by having multi-skilled resources who are qualified and trained to work on both the chassis and the aerial device portions of buckets and derricks. Most outsource providers work on one or the other, not on both. By having these resources aligned with utility operations, Fleet Services can make adjustments to maintenance practices in order to minimize downtime and support safety practices in the most effective and efficient manner. This also allows Duke Energy to effectively incorporate best practices and lessons learned that are specific to utility operations. The Duke Energy Fleet Services model is consistent with larger utilities across the United States.

Duke Energy Fleet Services has a total of 325 employees who support the enterprise across all jurisdictions spread across 6 states. Approximately 145 are operations staff dedicated to DEC and DEP. These employees are located in 16 individual locations in the Carolinas to ensure timely and effective response to operation needs.

Duke Energy Fleet Services uses a direct charging methodology to allocate costs associated with services provided. All work is captured using an enterprise Work Management system at the individual asset level and charged back based on specific accounting provided for the asset. Rates that cover overhead cost including facilities, tools, materials not in inventory, supervision, administration, etc. are applied to the individual asset level. Costs associated with fuel, parts, ownership, and work done by outsource providers are also applied at the individual asset level. This ensures proper allocation of charges based on the individual equipment cost, maintenance, and fuel consumption. This methodology ensures all costs, including overheads, are appropriately allocated to the jurisdictions for which the vehicles and equipment are supporting or to the non-regulated entities that are also a part of Duke Energy.

3) Provide a short narrative explaining how the service function performs a cost-benefit analysis:

Duke Energy Fleet Services consistently evaluates services provided to the utility to ensure it is

providing good value. Fleet Services uses three main benchmarks and data points for this evaluation. Both the summary results of market cost and industry benchmark as well as the survey results are attached to this report.

1. **Market Cost Comparison** – Fleet Services compares its total cost, which includes acquisition and maintenance for key units, to the cost of leasing the same units with a maintenance agreement. This analysis is performed for specific types of units (light-duty vehicles and medium/heavy duty trucks) which represent approximately 58% of our total fleet. This provides directional feedback on its cost as it is not an apples-to-apples comparison. Lease maintenance agreements exclude items that are common maintenance and repair items for units like cracked windshields, tire work, and other damage associated with utility work. Finally, this benchmark does not account for utility-specific business requirements like response time and storm support. Attached is the 2020 analysis for light-duty vehicles and medium/heavy duty trucks which accounts for over 58% of the total fleet.

    a. **2020 Results**: Duke Energy Fleet Services' fully loaded monthly cost is lower than the market including maintenance items like tire work, cracked windshield, and minor damage, which are excluded from lease maintenance agreements.

2. **Industry Benchmark** - Duke Energy Fleet Services participates in an industry benchmark study performed by an external transportation industry benchmarking company. This benchmark study includes data from utilities across the United States. The study only identifies Duke Energy by name in order to honor confidentiality agreements with the individual utilities that participate in the study. Fleet Services annual analysis includes industry benchmark charts that compares its 3-year average purchase price as well as its fully loaded maintenance cost to the average from all utilities who participate in the external benchmark study. For more standard types of equipment like light-duty vehicles, including SUVs and trucks, the blended average provides a good benchmark to compare both its acquisition and maintenance costs to the industry; however, for more customized equipment like buckets and derricks, the comparison against industry averages is less precise as both purchase price and on-going maintenance costs are impacted by equipment specifications that are not accounted for in general industry averages. Equipment specifications are developed in collaboration with operations to ensure the needs of the utility are met and are based on the type of work, geography, and overall objectives to enhance safety and efficiency.

    a. **2019 Results:** For the more standard types of vehicles such as pickups and SUV's, Duke Energy's acquisition and maintenance costs (total costs) per mile are significantly lower than the industry averages. For the more specialized equipment, specifically buckets and derricks, Duke Energy's acquisition and maintenance costs (total costs) per mile are on average in line with the industry averages. This is a good result considering that the majority of Duke Energy's bucket trucks are material handlers which result in higher initial purchase price and maintenance cost. Similarly, Fleet Services' derricks are equipped with remote controls which result in higher initial purchase price and maintenance cost. These added options result in added versatility, productivity and safety for our crews. Duke Energy's scale and our focus on standardization allows us to negotiate with manufacturers.

3. **Customer Satisfaction Survey** – Duke Energy Fleet Services conducts an independent survey, which is administered by an external transportation industry benchmarking company. A survey with questions on all aspects of Fleet Services is sent to custodians for all units in Duke Energy's fleet. Fleet Services receives a rollup summary with average scores and a list of comments provided.

a. **2020 Results:** Response range from 1- Very Dissatisfied to 6 – Very Satisfied with 5 being Satisfied. Below is a table summarizing the 2020 results by jurisdiction.

Carolinas East	5.53
Carolinas West	5.27
Florida	5.19
Midwest	5.11

4) Provide a listing of all evidence document names being submitted with this form as proof of performing a market study within the last 4 years (2017-2021) (i.e. Benchmark Analysis_2017.ppt):

1. **2020 Fleet Services Market and Benchmark Study** – This document summarizes the results of the 2020 market comparisons and benchmark analysis with other utilities. The charts included in the document came directly from the online 2019 utility benchmark data.

2. **2020 Fleet Users Satisfaction Survey** – This is a summary with average scores provided by an external benchmarking company by category. A detailed report with comments is also available.

5) Provide the current employee to contingent worker ratio for the function (i.e. total count, FTE's and CW's and %):

- Duke Energy Fleet Services does not utilize contingent workers other than to cover for certain clerical functions during vacancies, extended leave of absences, or certain special projects related to company-wide initiatives (e.g., electrification). FTE's for maintenance services are supplemented through outsource providers and overtime. Duke Energy leverages resources from other jurisdictions primarily during storm support and other contingencies to support the utility.

6) Use the selectors below to indicate where the Service Function should be plotted on the Feasibility Matrix:

a) Impact to the Regulated Utility (How crucial is it to utility operations and compliance?)
Fleet Services procures and maintains vehicles and equipment that are used by the utility for all aspects of their work including restoration efforts. Bucket trucks and digger derricks are needed to build and maintain Duke Energy's electric system and provide emergency response, while dozers, locomotives, and cranes support operations of the generation plants Without this equipment, the regulated utility cannot perform its functions in a safe and efficient manner.

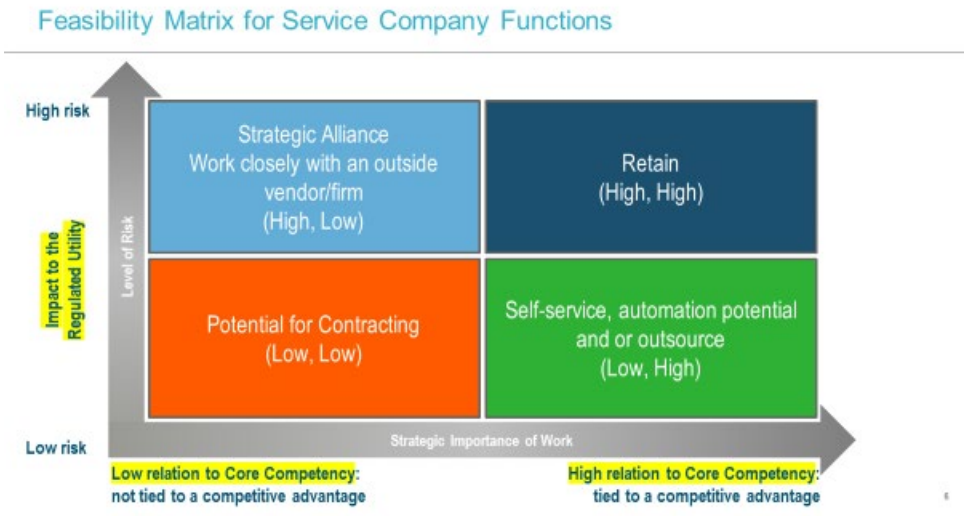
1-Low to 10-High:
9

b) ***Relationship to Core Competency (How unique is the service; do many firms offer similar services on the open market; is it fairly specialized?)***
Fleet Services focuses the efforts of the in-house staff on the items that are critical to the utility. There are no outside companies in the open market that can effectively work on the entire truck (chassis and aerial device) and/or provide the dedicated support and response time required by the utility particularly during storm restoration or emergency response where priorities need to be shifted on a moment's notice. Even during routine business operations, repair deadlines are often negotiated based on the overall benefit to the company. The organization evaluates the cost benefit of doing the work in-house vs. leveraging outsource providers. Support for standard equipment and

repair activities that are not cost effective to provide in-house are outsourced. Examples of functions and work that are currently outsourced include the following: body work, glass replacement, transmission re-builds and repairs, hydraulic cylinder repairs, most tire work as well as some heavy construction and light-duty vehicles repairs.

1-Low to 10-High:

9



7) Point of contact for the Service Function *(This person may be contacted by the Public Staff or Auditor to discuss information described in this document):*

Responder Name:	Mike Allison
Job Title:	Director Design and Technical Support Services
Organization/Department:	Fleet Services
Telephone Number:	(704) 382-4750
Email Address:	Mike.allison@duke-energy.com
Date Form was Completed:	4/6/2021

Return completed form and all evidence documentation to Joan De Vera by April 2, 2021

Docket No. E-7, Sub 1100D
Docket No. E-2, Sub 1095D
Docket No. G-9, Sub 682D

2021 Duke Energy Market Competitiveness Study

Transportation - Fleet Services Submission Form

Attachments Filed under Seal