

January 3, 2024

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

VIA ELECTRONIC FILING

Re: Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, Pursuant to N.C.G.S. § 62-110.9 and § 62-110.1(c)

Docket No. E-100, Sub 190

Dear Ms. Dunston:

Walmart Inc. ("Walmart") provides this Letter in Lieu of Comments in response to the North Carolina Utilities Commission's ("Commission") December 20, 2023, *Order Requesting Comments on Request for Development of Supplemental Portfolios and Adjustment to Procedural Schedule* in the above-referenced docket, which seeks parties' input on (1) Duke Energy Carolinas, LLC's ("DEC") and Duke Energy Progress, LLC's ("DEP") (collectively, "Duke" or "Companies") planned supplemental modeling and supplemental testimony; and (2) the procedural schedule proposed by Duke in its November 30, 2023, filing.

Walmart does not oppose the Companies' proposal to conduct supplemental modeling and to file supplemental testimony as described in the November 30 filing. The load growth identified in Duke's November 30 filing renders much of the analysis conducted in the Companies' original Carbon Plan and Integrated Resource Plan ("CPIRP") filing stale and inaccurate. While there will always be changes between when modeling is conducted and a hearing is held, this case appears to be unique in light of the materiality of the change in load growth. Moreover, because of the manner in which the Commission ordered this case to be filed, sufficient time appears to exist to permit this modeling to occur in sufficient time for the Commission to render a decision consistent with N.C.G.S. § 62-110.9.

With respect to the procedural schedule that should be adopted in the event the Commission permits Duke to engage in this supplemental modeling, Walmart believes that positions of other parties providing their own modeling-based testimony must be taken into account so that these parties can fully and meaningfully participate in this proceeding. Substantial time, effort and expense have been incurred by these parties to engage modeling experts. Walmart supports the Commission adopting a procedural schedule that affording Public Staff and other intervening parties sufficient time to update their modeling based on the supplemental modeling and testimony to be provided by the Companies.

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Walmart appreciates the Commission's consideration of Walmart's perspective on this issue.

If you have any questions regarding this filing, please contact me.

Respectfully submitted,



Carrie H. Grundmann (NC Bar No. 52711)

Counsel for Walmart Inc.

CHG/sds

Attachment

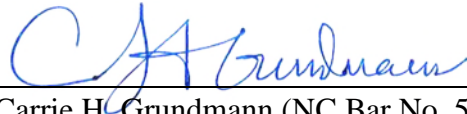
c: Certificate of Service

OFFICIAL COPY

Jan 03 2024

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Letter in Lieu of Comments of Walmart Inc. has been served this day upon the parties of record in this proceeding by electronic mail.



Carrie H. Grundmann (NC Bar No. 52711)

Dated: January 3, 2024