



DUKE ENERGY PROGRESS

INTEGRATED RESOURCE PLAN ATTACHMENT I

NC RENEWABLE ENERGY & ENERGY EFFICIENCY PORTFOLIO STANDARD (NC REPS)

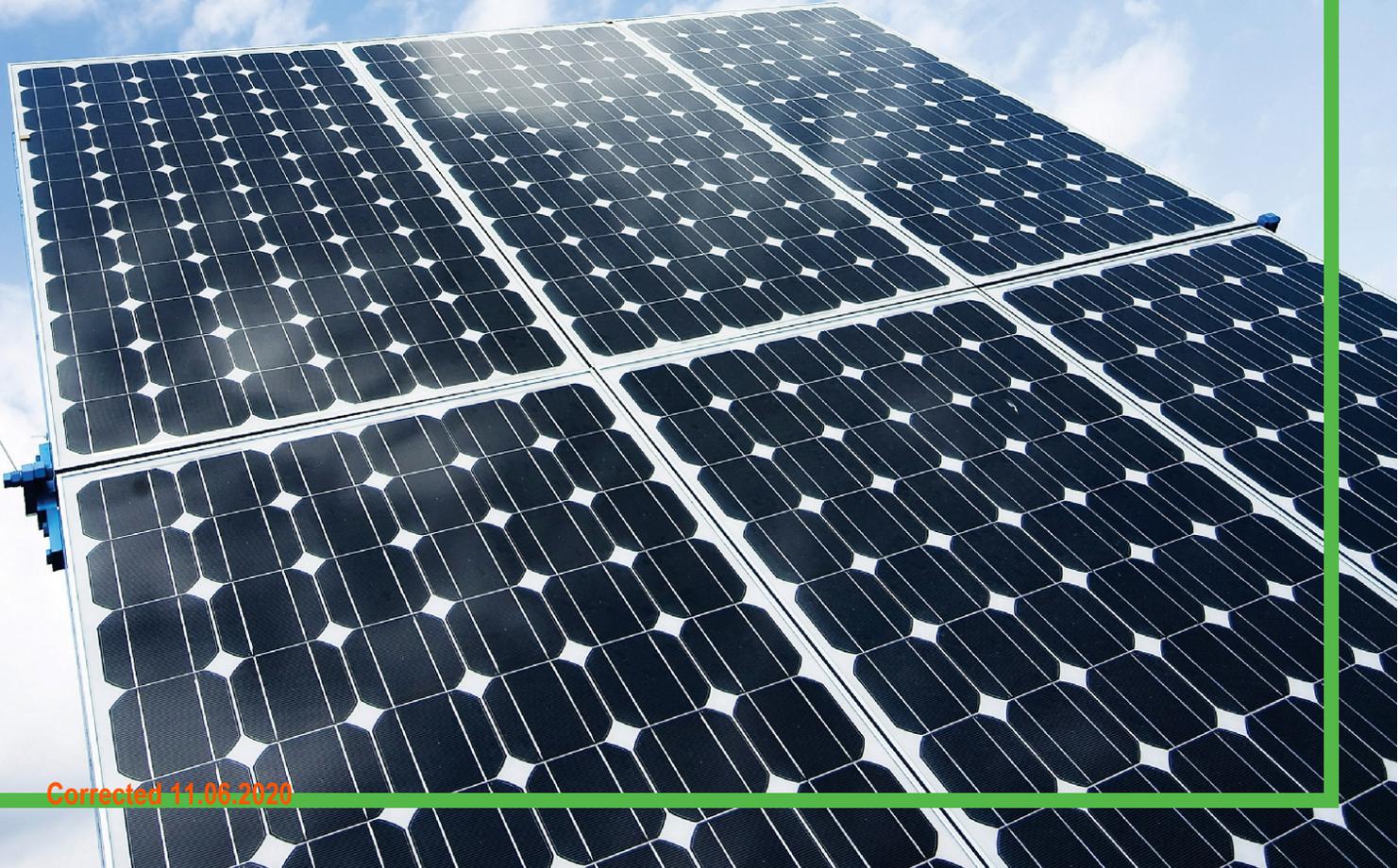
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COMPLIANCE PLAN - **REDACTED**

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**NC RENEWABLE ENERGY &
ENERGY EFFICIENCY
PORTFOLIO STANDARD (NC REPS)
COMPLIANCE PLAN**





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I. INTRODUCTION

Duke Energy Progress, LLC (“DEP” or “the Company”) submits its annual Renewable Energy and Energy Efficiency Portfolio Standard (“NC REPS” or “REPS”) Compliance Plan (“Compliance Plan”) in accordance with NC Gen. Stat. § 62-133.8 and North Carolina Utilities Commission (“the Commission”) Rule R8-67(b). This Compliance Plan, set forth in detail in Section II and Section III, provides the required information and outlines the Company’s projected plans to comply with NC REPS for the period 2020 to 2022 (“the Planning Period”). Section IV addresses the cost implications of the Company’s REPS Compliance Plan.

In 2007, the North Carolina General Assembly enacted Session Law 2007-397 (Senate Bill 3), codified in relevant part as NC Gen. Stat. § 62-133.8, in order to:

- Diversify the resources used to reliably meet the energy needs of consumers in the State;
- Provide greater energy security through the use of indigenous energy resources available within the State;
- Encourage private investment in renewable energy and energy efficiency; and
- Provide improved air quality and other benefits to energy consumers and citizens of the State.

As part of the broad policy initiatives listed above, Senate Bill 3 established the NC REPS, which requires the investor-owned utilities, electric membership corporations or co-operatives, and municipalities to procure or produce renewable energy, or achieve energy efficiency savings, in amounts equivalent to specified percentages of their respective retail megawatt-hour (“MWh”) sales from the prior calendar year.

Duke Energy Progress seeks to advance these State policies and comply with its REPS obligations through a diverse portfolio of cost-effective renewable energy and energy efficiency resources. Specifically, the key components of Duke Energy Progress’ 2020 Compliance Plan include: (1) purchases of renewable energy certificates (“RECs”); (2) purchases of renewable biogas to generate RECs; (3) constructing and operating Company-owned renewable facilities; (4) energy efficiency programs that will generate savings that can be counted towards the Company’s REPS obligation; and (5) research studies to enhance the Company’s ability to comply with its future REPS obligations. The Company believes that these actions yield a diverse portfolio of qualifying resources and allow a flexible mechanism for compliance with the requirements of NC Gen. Stat. § 62-133.8.

In addition, the Company has undertaken, and will continue to undertake, specific regulatory and operational initiatives to support REPS compliance, including: (1) submission of regulatory applications to pursue reasonable and appropriate renewable energy and energy efficiency initiatives in support of the Company's REPS compliance needs; (2) solicitation, review, and analysis of proposals from renewable energy suppliers offering RECs and diligent pursuit of the most attractive opportunities, as appropriate; and (3) development and implementation of administrative processes to manage the Company's REPS compliance operations, such as procuring and managing renewable resource contracts, accounting for RECs, safely interconnecting renewable energy suppliers, reporting renewable generation to the North Carolina Renewable Energy Tracking System ("NC-RETS"), and forecasting renewable resource availability and cost in the future.

The Company believes these actions collectively constitute a thorough and prudent plan for compliance with NC REPS and demonstrate the Company's commitment to pursue its renewable energy and energy efficiency strategies for the benefit of its customers.

II. REPS COMPLIANCE OBLIGATION

Duke Energy Progress calculates its NC REPS Compliance Obligations¹ for 2020, 2021, and 2022 based on interpretation of the statute (NC Gen. Stat. § 62-133.8), the Commission's rules implementing Senate Bill 3 (Rule R8-67), and subsequent Commission orders, as applied to the Company's actual or forecasted retail sales in the Planning Period. Table 1 below shows the Company's retail customers' REPS Compliance Obligation.

¹ For the purposes of this Compliance Plan, Compliance Obligation is more specifically defined as Duke Energy Progress' native load obligations for the Company's retail sales.

TABLE 1
DUKE ENERGY PROGRESS' NC REPS COMPLIANCE OBLIGATION

Compliance Year	Previous Year DEP Retail Sales (MWhs) (1)	Solar Set-Aside (RECS)	Swine Set-Aside (RECS)	Poultry Set-Aside (RECS)	REPS Requirement (%) (2)	Total REPS Compliance Obligation (RECS)
2020	37,938,229	75,877	26,577	195,649	10%	3,793,823
2021	37,869,500	75,739	26,509	251,548	12.5%	4,733,688
2022	37,711,370	75,423	52,796	251,548	12.5%	4,713,922

(1) Annual compliance REC requirements are determined based on prior-year MWh sales. Retail sales figures shown for compliance years 2021 and 2022, are estimates of 2020 and 2021 retail sales, respectively.

As shown in Table 1, the Company’s requirements in the Planning Period include the solar energy resource requirement (“Solar Set-Aside”), swine waste resource requirement (“Swine Waste Set-Aside”), and poultry waste resource requirement (“Poultry Waste Set-Aside”). In addition, the Company must also ensure that, in total, the RECs that it produces or procures, combined with energy efficiency savings, are an amount equivalent to 10% of its prior-year retail sales in compliance year 2020, and 12.5% of its prior-year retail sales in compliance years 2021 and 2022. The Company refers to this as its Total Obligation. For clarification, the Company refers to its Total Obligation, net of the Solar, Swine Waste, and Poultry Waste Set-Aside requirements, as its General Requirement.

III. REPS COMPLIANCE PLAN

In accordance with Commission Rule R8-67b(1)(i), the Company describes its planned actions to comply with the Solar, Swine Waste, and Poultry Waste Set-Asides, as well as the General Requirement below. The discussion first addresses the Company’s efforts to meet the Set-Aside requirements and then outlines the Company’s efforts to meet its General Requirement in the Planning Period.

A. SOLAR ENERGY RESOURCES

Pursuant to NC Gen. Stat. § 62-133.8(d), the Company must produce or procure solar RECs equal to a minimum of 0.20% of the prior year’s total electric energy in MWh sold to retail customers in North Carolina in 2020, 2021 and 2022.

Based on the Company's actual retail sales in 2019, the Solar Set-Aside is 75,877 RECs in 2020. Based on forecasted retail sales, the Solar Set-Aside is projected to be approximately 75,739 RECs in 2021 and 75,423 RECs in 2022. The Company has fully satisfied and exceeded the minimum Solar Set-Aside requirements in the Planning Period through a combination of Power Purchase Agreements and Company-owned solar facilities, including those listed below.

- Camp Lejeune Solar Facility – 13MW, located in Onslow County, placed in service in November 2015;
- Warsaw Solar Facility – 65MW, located in Duplin County, placed in service in December 2015;
- Fayetteville Solar Facility – 23MW, located in Bladen County, placed in service in December 2015; and
- Elm City Solar Facility – 40MW, located in Wilson County, placed in service in March 2016.

Additional details with respect to the REC purchase agreements are set forth in Exhibit A.

B. SWINE WASTE-TO-ENERGY RESOURCES

Pursuant to NC Gen. Stat. § 62-133.8(e), as amended by the North Carolina Utilities Commission (“NCUC”) *Order Modifying the Swine and Poultry Waste Set-Aside Requirement and Providing Other Relief* (December 16, 2019), and its *Errata Order* (February 13, 2020), in Docket No. E-100, Sub 113, for compliance years 2020 and 2021, at least 0.07%, and in 2022, at least 0.14%, of prior-year total retail electric energy sold in aggregate by utilities in North Carolina must be supplied by energy derived from swine waste. The Company's Swine Waste Set-Aside is estimated to be 26,557 RECs in 2020, 26,509 RECs in 2021, and 52,796 RECs in 2022.

Swine waste-to-energy compliance challenges have been numerous and varied. Three paths to the creation of swine waste-to-energy RECs have been identified, although each path faces unique challenges.

1. ON-FARM GENERATION

Projects consisting of digestion and generation on a single farm or tight cluster of farms often face gas production and feedstock agreement challenges, as well as interconnection difficulties. The Company understands that many farms in NC are contract growers and have only limited term

agreements with the integrators. Accordingly, many contract growers are not in a position to provide a firm supply of waste sufficient to support project financing. On July 27, 2017 Governor Cooper signed into law the “Competitive Energy Solutions for North Carolina” bill or House Bill 589 (“HB 589”) (SL 2017-92), which included establishing an expedited interconnection review process for swine and poultry waste facilities that are two megawatts or less in size. This provision should help overcome some of the interconnection difficulties projects have experienced in the past.

One on-farm generation project with which DEP has a swine REC contract reached Commercial Operation in October 2019. The project developer has informed DEP that they are facing difficulties ramping up to full capacity due to insufficient fuel supply to run the facility at all times.

2. CENTRALIZED DIGESTION

This type of system would benefit farmers that cannot individually construct and operate an anaerobic digester manure handling system on their own due to the capital expense or just don't have the number of animals required to operate a digester successfully or cost effectively. Farms located close to each other could share the cost of the centrally located digester system. The centralized digester operated by an individual or private company would carry out the operation and maintenance of the digester and its mechanical systems. It would have the same advantages as on-farm digesters of odor reduction, pathogen and weed seed destruction, biogas production and a stable effluent ready to fertilize fields and crops. A downside with centralized digestion exists if the liquid swine waste must be transported to the central site. One project has overcome this risk by co-locating the facility adjacent to a swine processing plant. The Company recognizes that NIMBY (“Not In My Back Yard”) issues may scuttle some developers' plans for overcoming fuel supply and interconnection problems faced by more rural, on-farm projects.

3. DIRECTED BIOGAS

Directed biogas² reduces costs by piping isolated methane to a central area where it is cleaned up and injected into a natural gas pipeline and moved to large, efficient combined cycle plants in the place of smaller, less-efficient reciprocating engines typical of other projects. Technological advances in this field have helped drive pricing down to comparable levels of on-site generation for

³ “Directed Biogas” is defined as pipeline quality methane, injected into the pipeline system, and nominated to Duke Energy Progress generating facilities; this methane is biogenically derived from Swine Waste, Poultry Waste, and general Biomass sources.

swine projects. The Company has worked diligently with Piedmont Natural Gas Company, Inc. (“Piedmont”) and other market participants to help develop specifications for injection and contracts that developers can utilize. Continued challenges in this area include pipeline interconnection costs, gas clean-up requirements prior to injection and the general lack of physical proximity between clusters of farms and pipeline infrastructure.

The Company has entered into three contracts to purchase swine waste-derived directed biogas from projects in North Carolina. One project successfully interconnected with Piedmont in March 2018 and another in December 2019. Both facilities are sending biogas to DEP’s Smith Energy Complex where swine RECs are being generated. The third project is expected to come online in 2021. The Company continues to explore opportunities for additional directed biogas in North Carolina through discussions with developers as well as participation in a collaborative group working to deploy renewable natural gas in Eastern North Carolina.

On June 19, 2018, the NCUC issued an *Order Approving Appendix F and Establishing a Pilot Program* in Docket No. G-9, Sub 698. This Order introduces some uncertainty surrounding the future of swine and poultry waste-derived directed biogas projects, as it establishes a three-year pilot program where Piedmont will provide information to the NCUC regarding the impact of Alternative Gas³ on its system operations and its customers. Piedmont and other Alternative Gas suppliers may apply to the Commission to participate in the pilot program; however, applicants must demonstrate to the Commission that such additions will be useful in gathering the information and data sought by the Commission. At the end of the three-year period, the Commission will consider additional modifications to Appendix F, which sets forth the terms and conditions under which Piedmont will accept Alternative Gas into its system, based on the experience gained during the pilot period. The additional filing requirement and the Commission’s approval process add to the time it takes for additional projects to come on-line in the short term. The Companies believe that compliance efforts will eventually be met, however, and that the pilot program will ensure that Alternative Gas does not negatively impact the greater Piedmont system.

In an effort to meet compliance with the Swine Waste Set Aside, the Company (1) continues direct negotiations for additional supplies of both in-state and out-of-state resources; (2) works diligently to understand the technological, permitting, and operational risks associated with various methods

³ “Alternative Gas” is defined in Appendix F as gas capable of combustion in customer appliances or facilities which is similar in heat content and chemical characteristics to natural gas produced from traditional underground well sources and which is intended to act as a substitute or replacement for Natural Gas (as that term is defined in Piedmont’s North Carolina Service Regulations). Alternative Gas shall include but not be limited to biogas, biomethane, and landfill gas, as well as any other type of natural gas equivalent produced or manufactured from sources other than traditional underground well sources.

of producing qualifying swine RECs and to aid developers in overcoming those risks; when those risks cannot be overcome, the Company works with developers via contract amendments to adjust for outcomes that the developers believe are achievable based on new experience; (3) explores modifications to current biomass and set-asides contracts by working with developers to add swine waste to their fuel mix; (4) continues pursuit of swine-derived directed biogas from North Carolina facilities and directing such biogas to combined cycle plants for combustion and generation; (5) utilizes the broker market for out-of-state swine RECs available in the market; (6) engages the North Carolina Pork Council (“NCPC”) in a project evaluation collaboration effort that will allow the Company and the NCPC to discuss project viability, as appropriate with respect to the Company’s obligations to keep certain sensitive commercial information confidential; and (7) supports research studies through North Carolina State University associated with on-farm swine waste drying technology and through Research Triangle Institute associated with biogas utilization in North Carolina.

Duke Energy Progress is in a position to comply with its Swine Waste Set-Aside requirement in 2020, but the Company’s ability to comply in 2021 and 2022 is dependent on the performance of swine waste-to-energy developers under current contracts, particularly achievement of projected delivery requirements and commercial operation milestones. New swine projects are scheduled to come online over the next few years. The ability of these facilities to achieve projected delivery requirements and commercial operation milestones will determine the levels of compliance that DEP is able to meet in 2021 and 2022. The Company understands that swine waste-to-energy projects have encountered difficulties in achieving the full REC output of their contracts due to issues including local opposition to siting of the facilities, the inability to secure firm and reliable sources of swine waste feedstock from waste producers in North Carolina, difficulties securing project financing, interconnection challenges, force majeure due to natural disasters and technological challenges encountered when ramping up production. In addition, the outbreak of the COVID-19 pandemic has adversely impacted swine and poultry farms and processing plants in North Carolina through staff shortages, personal protective equipment supply issues, and delivery challenges. Although industry representatives and state and federal authorities are working to ensure continuity of operations, uncertainty remains about the magnitude of the pandemic’s impact in North Carolina and its corresponding effect on poultry and swine waste to energy production.

The Company remains actively engaged in seeking additional resources and continues to make every reasonable effort to comply with the Swine Waste Set-Aside requirements. Additional details with respect

to the Company's compliance efforts and REC purchase agreements are set forth in Exhibit A and the Company's semiannual progress reports, filed confidentially in Docket No. E-100, Sub 113A.

C. POULTRY WASTE-TO-ENERGY RESOURCES

Pursuant to NC Gen. Stat. § 62-133.8(f), as amended by NCUC *Order Modifying the Swine and Poultry Waste Set-Aside Requirements and Providing Other Relief* (December 16, 2019), and its *Errata Order* (February 13, 2020), in Docket No. E-100, Sub 113, for compliance year 2020, at least 700,000 MWhs, and for 2021 and 2022, at least 900,000 MWhs, or an equivalent amount of energy, shall be produced or procured each year from poultry waste, as defined per the Statute and additional clarifying Orders. As the Company's retail sales share of the State's total retail megawatt-hour sales is approximately 28%, the Company's Poultry Waste Set-Aside is estimated to be 195,649 RECs in 2020, 251,548 RECs in 2021, and 251,548 in 2022.

In an effort to meet compliance with the Poultry Waste Set-Aside, the Company (1) continues direct negotiations for additional supplies of both in-state and out-of-state resources with multiple counterparties; (2) works diligently to understand the technological, permitting, and operational risks associated with various methods of producing qualifying poultry RECs and to aid developers in overcoming those risks; when those risks cannot be overcome, the Company works with developers via contract amendments to adjust for more realistic outcomes; (3) explores leveraging current biomass contracts by working with developers to add poultry waste to their fuel mix; (4) explores adding thermal capabilities to current poultry sites to bolster REC production; (5) explores poultry-derived directed biogas at facilities located in North Carolina and directing such biogas to combined cycle plants for combustion and electric generation; (6) utilizes the broker market for out-of-state poultry RECs available in the market; and (7) supports a research study through Research Triangle Institute associated with biogas utilization in North Carolina.

Duke Energy Progress is in a position to comply with its Poultry Waste Set-Aside requirement in 2020, but the Company's ability to procure sufficient volumes of RECs to meet its pro-rata share of the increased Poultry Waste Set-Aside requirements in 2021 and 2022 is dependent on the performance of poultry waste-to-energy developers under current contracts, particularly achievement of projected delivery requirements. One new poultry facility came online in 2019 and is working to ramp up production. DEP's ability to comply in 2021 and 2022 is dependent on facilities producing at their contracted levels, and historical experience indicates that facilities usually experience some start-up issues and take time to

reach full expected production levels. Ramping up to meet the increased compliance targets for 2021 - 2022 has been problematic because suppliers have either delayed projects or lowered the volume of RECs to be produced. The Company is, nevertheless, encouraged by the growing use of thermal poultry RECs and the proposals that it has recently received from developers.

The Company remains actively engaged in seeking additional resources and continues to make every reasonable effort to comply with the Poultry Waste Set-Aside requirements. Additional details with respect to the Company's compliance efforts and REC purchase agreements are set forth in Exhibit A and the Company's semiannual progress reports, filed confidentially in Docket No. E-100, Sub 113A.

D. GENERAL REQUIREMENT RESOURCES

Pursuant to NC Gen. Stat. § 62-133.8, DEP is required to comply with its Total Obligation by submitting for retirement a total volume of RECs equivalent to 10% of prior-year retail sales in North Carolina in compliance year 2020, and 12.5% in 2021 and 2022. Based on the Company's actual retail sales in 2019, the Total Requirement is 3,793,823 RECs in 2020. Based on forecasted retail sales, the Total Requirement is projected to be approximately 4,733,688 RECs in 2021, and 4,713,922 RECs in 2022. This requirement net of the Solar, Swine Waste, and Poultry Waste Set-Aside requirements, referred to as the General Requirement, is estimated to be 3,495,740 RECs in 2020, 4,379,892 RECs in 2021, and 4,334,155 RECs in 2022. The various resource options available to the Company to meet the General Requirement are discussed below, as well as the Company's plan to meet the General Requirement with these resources. The Company has contracted for, or otherwise procured, sufficient resources to meet its General Requirement in the Planning Period. The Company submits that the actions and plans described herein represent a reasonable and prudent plan for meeting the General Requirement.

1. USE OF SOLAR RESOURCES FOR GENERAL REQUIREMENT

Duke Energy Progress plans to meet a significant portion of the General Requirement with RECs from solar facilities. Solar energy has emerged as a predominant renewable energy resource in the Southeast, and the Company views the downward trend in solar equipment and installation costs over the past several years as a positive development. As such, the Company is using solar resources to contribute to our compliance efforts beyond the Solar Set-Aside minimum threshold for NC REPS, and will continue to do so during the Planning Period.

i. NET METERING FACILITIES

Under the current Net Metering for Renewable Energy Facilities Rider offered by DEP (Rider NM-4B), a customer receiving electric service under a schedule other than a time-of-use schedule with demand rates shall provide any RECs to DEP at no cost. Per the NCUC's June 2018 *Order Approving Rider and Granting Waiver Request*, filed in Docket No. E-2, Sub 1106, since net metering generators are not individually metered, DEP is permitted to estimate the RECs generated by these facilities using the PVWatts Solar Calculator developed by the National Renewable Energy Laboratory. Thus, DEP will follow the calculations approved by the NCUC to estimate the number of RECs generated from net metering facilities and will use these RECs for REPS compliance.

ii. NORTH CAROLINA SOLAR REBATE PROGRAM

North Carolina HB 589 introduced a solar rebate program, which offers incentives to residential and non-residential customers for the installation of small customer owned or leased solar energy facilities participating in the Company's net metering tariff. The incentive is limited to 10 kilowatts alternating current ("kW AC") for residential solar installations and 100 kW AC for non-residential solar installations. HB 589 limited the program incentive to 10,000 kW of installed capacity annually starting January 1, 2018 and continuing until December 31, 2022. Since all customers participating in the Solar Rebate Program must be participating in DEP's net metering tariff, DEP retains the rights to the RECs from these facilities, as described in the net metering section above. In addition, under HB 589, DEP shall be authorized to recover all reasonable and prudent costs of incentives provided to customers and program administrative costs through the REPS Rider. Projected costs associated with the Solar Rebate Program are included in Table 5.

2. ENERGY EFFICIENCY

During the Planning Period, the Company plans to meet up to 25% of the Total Obligation with Energy Efficiency ("EE") savings in 2020, and up to 40% of the Total Obligation with EE savings in 2021 and 2022, which is the maximum allowable amount under NC Gen. Stat. § 62-133.7(b)(2)c. The Company continues to develop and offer its customers new and innovative EE programs that will deliver savings and count towards its future NC REPS requirements. Pursuant to Commission Rule R8-67b(1)(iii), the Company has attached a list of those EE measures that it plans to use toward REPS compliance, including projected impacts and a description of the measure, as Exhibit B.

3. BIOMASS RESOURCES

Duke Energy Progress plans to meet a portion of the General Requirement through a variety of biomass resources, including landfill gas to energy, combined heat and power, and direct combustion of biomass fuels. The Company is purchasing RECs from multiple biomass facilities in the Carolinas, including landfill gas to energy facilities and biomass-fueled combined heat and power facilities, all of which qualify as renewable energy facilities. Please see Exhibit A for more information on each of these contracts.

Duke Energy Progress notes, however, that reliance on direct-combustion biomass remains limited in long-term planning horizons, in part due to continued uncertainties around the developable potential of such resources in the Carolinas and the projected availability of more cost-effective forms of renewable resources.

4. HYDROELECTRIC POWER

Duke Energy Progress plans to use hydroelectric power from hydroelectric generation suppliers whose facilities have received Qualifying Facility (“QF” or “QF Hydro”) status. RECs from QF Hydro facilities will be used towards the General Requirements of Duke Energy Progress’ retail customers. Please see Exhibit A for more information on these contracts.

5. WIND

Duke Energy Progress considers wind a potential viable option to support increased diversity of the renewables portfolio and potentially long-term general compliance needs. While the Company may rely upon wind resources for future REPS compliance, the extent and timing will depend on deliverability, policy changes and market prices. Additional opportunities may exist to transmit wind energy from out of state regions where wind is more prevalent into the Carolinas.

6. COMPETITIVE PROCUREMENT OF RENEWABLE ENERGY (CPRE)

North Carolina HB 589 introduced a competitive procurement process for adding 2,660 MW (subject to adjustment) of additional renewable energy and capacity in the Carolinas, with proposals issued over a 45-month period beginning on February 21, 2018, when the NCUC approved the CPRE Program. Renewable energy facilities eligible to participate in the CPRE solicitation(s) include those

facilities that use renewable energy resources identified in NC Gen. Stat. § 62-133.8(a)(8), the REPS statute. DEP plans to use the RECs acquired through the CPRE RFP solicitations as needed for its future REPS compliance requirements and has therefore included the planned MW allocation and timeline in its REPS compliance planning process. Please see the CPRE Program Plan, which is included as Attachment II to this IRP, for additional information.

E. SUMMARY OF RENEWABLE RESOURCES

The Company has evaluated, procured, and/or developed a variety of types of renewable energy and energy efficiency resources to meet its NC REPS requirements within the compliance Planning Period. As noted above, several risks and uncertainties exist across the various types of resources and the associated parameters of the NC REPS requirements. The Company continues to carefully monitor opportunities and unexpected developments across all facets of its compliance requirements. Duke Energy Progress submits that it has crafted a prudent, reasonable plan with a diversified balance of renewable resources that will allow the Company to comply with its NC REPS obligation over the Planning Period.

IV. COST IMPLICATIONS OF REPS COMPLIANCE PLAN

A. CURRENT AND PROJECTED AVOIDED COST RATES

The Current Avoided Energy and Capacity costs included in the table below represent key data elements used to determine the PP (NC) tariff rates filed for DEP in Docket No. E-100, Sub 158.

The “Energy” columns reflect the cost of fuel and variable O&M per kilowatt-hour (“kWh”) embedded in the filed tariff energy rates. The “Capacity” column is based on the installed cost and capacity rating of a combustion turbine unit as reflected in the filed capacity rates.

The Projected Avoided Energy Costs included below reflect updated estimates of the same data elements provided with the current costs. The capacity cost shown is a placeholder based on the current avoided cost filing.

The avoided costs contained herein are subject to change, including (but not limited to) fuel price projections, variable O&M estimates, turbine costs and equipment capability.



TABLE 2
CURRENT AND PROJECTED AVOIDED COST RATES TABLE

[BEGIN CONFIDENTIAL]

CURRENT AVOIDED ENERGY AND CAPACITY COST ^(1,2,4)										
DEC	Summer Premium Peak (\$/MWh)	Summer PM On Peak (\$/MWh)	Summer Off Peak (\$/MWh)	Winter Premium Peak (\$/MWh)	Winter AM On Peak (\$/MWh)	Winter PM On Peak (\$/MWh)	Winter Off Peak (\$/MWh)	Shoulder On Peak (\$/MWh)	Shoulder Off Peak (\$/MWh)	Capacity Cost – Installed CT Cost (\$/kW)
2021	33.18	33.39	24.02	42.40	33.14	28.30	26.59	28.77	20.05	
2022	32.54	22.86	26.55	42.62	33.56	36.20	28.93	28.97	21.60	
2023	38.19	25.98	28.28	51.41	38.75	38.35	30.21	28.04	20.15	

PROJECTED AVOIDED ENERGY AND CAPACITY COST ^(1,3,4)										
	Summer Premium Peak (\$/MWh)	Summer PM On Peak (\$/MWh)	Summer Off Peak (\$/MWh)	Winter Premium Peak (\$/MWh)	Winter AM On Peak (\$/MWh)	Winter PM On Peak (\$/MWh)	Winter Off Peak (\$/MWh)	Shoulder On Peak (\$/MWh)	Shoulder Off Peak (\$/MWh)	Capacity Cost – Installed CT Cost (\$/kW)
2021										
2022										
2023										

NOTES:

- (1) On-peak and off-peak energy rates based on hours and information derived using methodology filed in Docket No. E-100, Sub 158.
- (2) Capacity Cost column provides the installed CT cost with AFUDC / nominal capacity filed in Docket No. E-100, Sub 158.
- (3) The capacity cost shown is a placeholder based on filed avoided capacity cost.
- (4) Does not incorporate additional considerations used in rate calculation and is subject to change.

[END CONFIDENTIAL]

B. PROJECTED TOTAL NORTH CAROLINA RETAIL SALES AND YEAR-END NUMBER OF CUSTOMER ACCOUNTS BY CLASS

TABLE 3
RETAIL SALES

	2019 ACTUAL	2020 FORECAST	2021 FORECAST	2022 FORECAST
Retail MWh Sales	37,938,229	37,869,500	37,711,370	37,668,114

The MWh sales reported above are those applicable to REPS compliance years 2020-2023, and represent actual MWh sales for 2019, and projected MWh sales for 2020-2022.

TABLE 4
RETAIL YEAR-END NUMBER OF CUSTOMER ACCOUNTS

	2019 ACTUAL	2020 FORECAST	2021 FORECAST	2022 FORECAST
Residential Accts	1,242,912	1,260,573	1,277,400	1,293,776
General Accts	200,154	201,316	202,410	203,449
Industrial Accts	1,801	1,789	1,778	1,768

The number of accounts reported above are those applicable to the cost caps for compliance years 2020-2023, and represent the actual number of accounts for year-end 2019, and the projected number of accounts for year-end 2020-2022.

C. PROJECTED ANNUAL COST CAP COMPARISON OF TOTAL AND INCREMENTAL COSTS, REPS RIDER AND FUEL COST IMPACT

Projected compliance costs for the Planning Period are presented in the cost tables below by calendar year. The cost cap data is based on the number of accounts as reported above.

TABLE 5
PROJECTED ANNUAL COST CAPS AND FUEL RELATED COST IMPACT

	2020	2021	2022
REPS Compliance – Avoided Cost (recovered through the Fuel Rider)	\$204,667,034	\$157,323,838	\$143,664,006
REPS Compliance – Incremental Cost	\$42,752,127	\$45,323,559	\$48,754,738
Total Incremental REPS Compliance Cost, including Regulatory Fee	\$42,807,777	\$45,382,557	\$48,818,201
Projected Annual Cost Caps (REPS Rider)	\$65,382,724	\$66,021,993	\$66,629,437
Solar Rebate Program Cost	\$1,415,964	\$2,006,140	\$2,564,409
Total Incremental REPS Compliance Cost & Solar Rebate Program Cost	\$44,168,091	\$47,329,699	\$51,319,147
Total projected REPS compliance costs	\$248,835,125	\$204,653,538	\$194,983,152

Resource Supplier	Contract Duration	REC Only?	Estimated RECs	Resource Supplier	Contract Duration
HYDROELECTRIC ENERGY RESOURCES			2020	2021	2022
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Contract list does not include Residential SunSense Solar PV participants

[END CONFIDENTIAL]

EXHIBIT B

**DUKE ENERGY PROGRESS, LLC'S 2020 REPS COMPLIANCE PLAN
DUKE ENERGY PROGRESS, LLC'S EE PROGRAMS AND PROJECTED REPS IMPACTS**

FORECAST OF ANNUAL ENERGY EFFICIENCY IMPACTS FOR THE REPS COMPLIANCE PLANNING PERIOD 2020-2022 (KWh)			
Residential Programs	2020	2021	2022
Energy Efficient Appliances and Devices	24,116,759	20,842,744	18,327,764
Energy Efficiency Education Program	4,092,896	4,052,125	4,052,125
Multi-Family Energy Efficiency	10,246,505	10,041,962	8,393,300
My Home Energy Report	138,988,972	139,336,431	139,684,614
Neighborhood Energy Saver	2,176,983	2,176,983	2,176,983
Residential Energy Assessments	10,044,613	10,967,030	10,853,424
Residential New Construction	13,756,937	14,444,783	14,878,127
Residential Smart \$aver Energy Efficiency	4,924,256	4,934,040	4,978,147
Low Income Weatherization Pay for Performance Pilot	130,518	130,518	0
Sub Total	208,478,439	206,926,617	203,344,484
Non-Residential Programs	2020	2021	2022
Non-Residential Smart \$aver Products and Assessment	89,218,117	90,117,471	89,770,243
Non-Residential Smart \$aver Performance Incentive	3,127,878	4,020,519	5,434,441
Small Business Energy Saver	33,433,750	29,342,065	26,151,439
EnergyWise for Business	46,852	43,301	41,004
Sub Total	125,826,597	123,523,356	121,397,128
Combined Residential and Non-Residential Programs	2020	2021	2022
Energy Efficient Lighting	32,798,999	24,107,234	22,206,384
Sub Total	32,798,999	24,107,234	22,206,384
Total	367,104,036	354,557,207	346,947,996

DEP ENERGY EFFICIENCY PROGRAMS

DEP uses the following energy efficiency (EE) programs in its IRP to efficiently and cost-effectively alter customer demands and reduce the long-run supply costs for energy and peak demand.

RESIDENTIAL EE PROGRAMS

- Energy Efficient Appliances and Devices
- Energy Efficiency Education
- Multi-Family Energy Efficiency
- My Home Energy Report
- Neighborhood Energy Saver
- Residential Energy Assessments
- Residential New Construction
- Residential Smart \$aver® Energy Efficiency
- Low Income Weatherization Pay for Performance Pilot

NON-RESIDENTIAL EE PROGRAMS

- Non-Residential Smart \$aver® Energy Efficiency Products and Assessment
- Non-Residential Smart \$aver® Performance Incentive
- Small Business Energy Saver
- EnergyWise for Business

COMBINED RESIDENTIAL/NON-RESIDENTIAL EE PROGRAMS

- Energy Efficient Lighting

RESIDENTIAL EE PROGRAMS

ENERGY EFFICIENT APPLIANCES AND DEVICES PROGRAM

The Energy Efficient Appliances and Devices Program is a new program that combines DEP's previous "Save Energy and Water Kit" with a variety of high efficiency products available through the Company's Online Savings Store, including but not limited to Air Purifiers, Dehumidifiers and LED Fixtures. The Save Energy and Water kit offers low flow water fixtures and insulating pipe tape to residential single-

family homeowners with electric water heaters. Program participants are eligible for one kit shipped free of charge to their home. Kits are available in two sizes for homes with one or more full bathrooms and contain varying quantities of shower heads, bathroom aerators, kitchen aerator and insulating pipe tape.

Energy Efficiency Education Program

The Energy Efficiency Education Program is an energy efficiency program available to students in grades K-12 enrolled in public and private schools who reside in households served by Duke Energy Progress. The Program provides principals and teachers with an innovative curriculum that educates students about energy, resources, how energy and resources are related, ways energy is wasted and how to be more energy efficient. The centerpiece of the current curriculum is a live theatrical production focused on concepts such as energy, renewable fuels and energy efficiency performed by two professional actors.

Following the performance, students are encouraged to complete a home energy survey with their family to receive an Energy Efficiency Starter Kit. The kit contains specific energy efficiency measures to reduce home energy consumption and is available at no cost to student households at participating schools. Teachers receive supportive educational material for classroom and student take home assignments. The workbooks, assignments and activities meet state curriculum requirements.

Multi-Family Energy Efficiency Program

The Multi-Family Energy Efficiency Program provides energy efficient lighting and water measures to reduce energy usage in eligible multi-family properties. The Program allows Duke Energy Progress to target multi-family apartment complexes with an alternative delivery channel. The measures are installed in permanent fixtures by the program administrator or the property management staff. The program offers LEDs including A-Line, Globes and Candelabra bulbs and energy efficient water measures such as bath and kitchen faucet aerators, water saving showerheads and pipe wrap.

My Home Energy Report Program

The My Home Energy Report (“MyHER”) Program provides residential customers with a comparative usage report that engages and motivates customers by comparing energy use to similar residences in the same geographical area based upon the age, size and heating source of the home. The report also empowers customers to become more efficient by providing them with specific energy saving recommendations to improve the efficiency of their homes. The actionable energy savings tips, as well as measure-specific coupons, rebates or other Company program offers that may be included in a customer’s report are based on that specific customer’s energy profile.

The program includes an interactive online portal that allows customers to further engage and learn more about their energy use and opportunities to reduce usage. Electronic versions of the My Home Energy Report are sent to customers enrolled on the portal. In addition, all MyHER customers with an email address on file with the Company receive an electronic version of their report monthly.

Neighborhood Energy Saver (Low-Income) Program

DEP's Neighborhood Energy Saver Program reduces energy usage through the direct installation of energy efficiency measures within the households of income qualifying residential customers. The Program utilizes a Company-selected vendor to: (1) provide an on-site energy assessment of the residence to identify appropriate energy conservation measures, (2) install a comprehensive package of energy conservation measures at no cost to the customer, and (3) provide one-on-one energy education. Program measures address end-uses in lighting, refrigeration, air infiltration and HVAC applications.

Program participants receive a free energy assessment of their home followed by a recommendation of energy efficiency measures to be installed at no cost to the resident. A team of energy technicians will install applicable measures and provide one-on-one energy education about each measure emphasizing the benefit of each and recommending behavioral changes to reduce and control energy usage.

Residential Energy Assessments Program

The Residential Energy Assessments Program provides eligible customers with a free in-home energy assessment, performed by a Building Performance Institute ("BPI") certified energy specialist and designed to help customers reduce energy usage and save money. The BPI certified energy specialist completes a 60 to 90 minute walk-through assessment of a customer's home and analyzes energy usage to identify energy savings opportunities. The energy specialist discusses behavioral and equipment modifications that can save energy and money with the customer. The customer also receives a customized report that identifies actions the customer can take to increase their home's efficiency.

In addition to a customized report, customers receive an energy efficiency starter kit with a variety of measures that can be directly installed by the energy specialist. The kit includes measures such as energy efficiency lighting, low flow shower head, low flow faucet aerators, outlet/switch gaskets, weather stripping and an energy saving tips booklet.

Residential New Construction Program

The Residential New Construction Program provides incentives for new single family and multi-family residential dwellings (projects of three stories and less) that fall within the 2012 North Carolina Residential Building Code to meet or exceed the 2012 North Carolina Energy Conservation Code High Efficiency Residential Option (“HERO”). If a builder or developer constructing to the HERO standard elects to participate, the Program offers the homebuyer an incentive guaranteeing the heating and cooling consumption of the dwelling’s total annual energy costs. Additionally, the Program incents the installation of high-efficiency heating, ventilating and air conditioning (“HVAC”) and heat pump water heating (“HPWH”) equipment in new single family, manufactured, and multi-family residential housing units.

New construction represents a unique opportunity for capturing cost effective EE savings by encouraging the investment in energy efficiency features that would otherwise be impractical or more costly to install at a later time.

Residential Smart \$aver® Energy Efficiency Program

The Residential Smart \$aver® EE Program offers DEP customers a variety of energy conservation measures designed to increase energy efficiency in existing residential dwellings. The Program utilizes a network of participating contractors to encourage the installation of: (1) high efficiency central air conditioning (AC) and heat pump systems with optional add on measures such as Quality Installation and Smart Thermostats, (2) attic insulation and sealing, (3) heat pump water heaters, and (4) high efficiency variable speed pool pumps.

The prescriptive menu of energy efficiency measures provided by the program allows customers the opportunity to participate based on the needs and characteristics of their individual homes. A referral channel provides free, trusted referrals to customers seeking reliable, qualified contractors for their energy saving home improvement needs.

Low Income Weatherization Pay for Performance Pilot

The Low Income Weatherization Pay for Performance Pilot was designed to provide payments, based on kilowatt-hour (“kWh”) savings, to local non-profit organizations that provide weatherization and other energy saving upgrades to residential low-income households. These payments are intended to assist the organizations in expanding the number of customers they serve through their programs. The Pilot is

also intended to leverage funding from other third-party sources. The Company is proposing that this Pilot remain in place for thirty-six months and begin in Buncombe County, North Carolina.

Non-Residential EE Programs

Non-Residential Smart \$aver® Energy Efficient Products and Assessment Program

The Non-Residential Smart \$aver® Energy Efficient Products and Assessment Program provides incentives to DEP commercial and industrial customers to install high efficiency equipment in applications involving new construction and retrofits and to replace failed equipment.

Commercial and industrial customers can have significant energy consumption but may lack knowledge and understanding of the benefits of high efficiency alternatives. The Program provides financial incentives to help reduce the cost differential between standard and high efficiency equipment, offer a quicker return on investment, save money on customers' utility bills that can be reinvested in their business, and foster a cleaner environment. In addition, the Program encourages dealers and distributors (or market providers) to stock and provide these high efficiency alternatives to meet increased demand for the products.

The program provides incentives through prescriptive measures, custom measures and technical assistance.

- ***Prescriptive Measures:*** Customers receive incentive payments after the installation of certain high efficiency equipment found on the list of pre-defined prescriptive measures, including lighting; heating, ventilating and air conditioning equipment; and refrigeration measures and equipment.
- ***Custom Measures:*** Custom measures are designed for customers with electrical energy saving projects involving more complicated or alternative technologies, whole-building projects, or those measures not included in the Prescriptive measure list. The intent of the Program is to encourage the implementation of energy efficiency projects that would not otherwise be completed without the Company's technical or financial assistance. Unlike the Prescriptive portion of the program, all Custom measure incentives require pre-approval prior to the project implementation.
- ***Energy Assessments and Design Assistance:*** Incentives are available to assist customers with energy studies such as energy audits, retro commissioning, and system-specific energy audits for existing buildings and with design assistance such as energy modeling for new construction. Customers may use a contracted Duke Energy vendor to perform the work or they may select

their own vendor. Additionally, the Program assists customers who identify measures that may qualify for Smart \$aver Incentives with their applications. Pre-approval is required.

Non-Residential Smart \$aver® Performance Incentive Program

The Non-Residential Smart \$aver® Energy Efficient Products and Assessment Program offers financial assistance to qualifying commercial, industrial and institutional customers to enhance their ability to adopt and install cost-effective electrical energy efficiency projects. The Program encourages the installation of new high efficiency equipment in new and existing non-residential establishments as well as efficiency-related repair activities designed to maintain or enhance efficiency levels in currently installed equipment. Incentive payments are provided to offset a portion of the higher cost of energy efficient installations that are not eligible under either the Smart \$aver® Prescriptive or Custom programs. The Program requires pre-approval prior to project initiation.

The types of projects covered by the Program include projects with some combination of unknown building conditions or system constraints, or uncertain operating, occupancy, or production schedules. The intent of the Program is to broaden participation in non-residential efficiency programs by being able to provide incentives for projects that previously were deemed too unpredictable to calculate an acceptably accurate savings amount, and therefore ineligible for incentives. This Program provides a platform to understand new technologies better. Only projects that demonstrate that they clearly reduce electrical consumption and/or demand are eligible for incentives.

The key difference between this program and the custom component of the Non-Residential Smart \$aver® Energy Efficient Products and Assessment program is that Performance Incentive participants get paid based on actual measure performance and involves the following two-step process.

- ***Incentive #1:*** For the portion of savings that are expected to be achieved with a high degree of confidence, an initial incentive is paid once the installation is complete.
- ***Incentive #2:*** After actual performance is measured and verified, the performance-based part of the incentive is paid. The amount of the payout is tied directly to the savings achieved by the measures.

Small Business Energy Saver Program

The Small Business Energy Saver Program reduces energy usage through the direct installation of energy efficiency measures within qualifying non-residential customer facilities. Program measures address

major end-uses in lighting, refrigeration, and HVAC applications. The program is available to existing non-residential customers that are not opted-out of the Company's EE/DSM rider and have an average annual demand of 180 kW or less per active account.

Program participants receive a free, no-obligation energy assessment of their facility followed by a recommendation of energy efficiency measures to be installed in their facility along with the projected energy savings, costs of all materials and installation, and up-front incentive amount from Duke Energy Progress. The customer makes the final determination of which measures will be installed after receiving the results of the energy assessment. The Company-authorized vendor schedules the installation of the energy efficiency measures at a convenient time for the customer, and electrical subcontractors perform the work.

ENERGYWISE FOR BUSINESS PROGRAM

EnergyWise for Business is both an energy efficiency and demand response ("DR") program for non-residential customers. Program participants can choose between a Wi-Fi thermostat or load control switch that will be professionally installed for free on each air conditioning or heat pump unit. The Wi-Fi thermostat option provides both EE and DR savings opportunities, while the load control switch option only offers DR savings capability. Only the EE component of the program is assumed to provide energy savings.

- ***EE Component***

Participants choosing the thermostat will be given access to a portal that will allow them to set schedules, adjust the temperature set points, and receive energy conservation tips and communications from DEP. In addition to the portal access, participants will also receive conservation period notifications, so they can make adjustments to their schedules or notify their employees of the upcoming conservation periods.

- ***DR Component***

The DR portion of the program allows DEP to reduce the operation of participants' air conditioning units to mitigate system capacity constraints and improve reliability of the power grid. In addition to equipment choice, participants can also select the cycling level they prefer (i.e., a 30%, 50% or 75% reduction of the normal on/off cycle of the unit). During a conservation period, DEP will send a signal to the thermostat or switch to reduce the on time of the unit by the cycling percentage selected by the participant. Participating customers will receive a \$50 annual bill credit for each unit at the 30% cycling level, \$85 for 50% cycling, or \$135 for 75% cycling. Participants that

have a heat pump unit with electric resistance emergency/back up heat and choose the thermostat can also participate in a winter option that allows control of the emergency/back up heat at 100% cycling for an additional \$25 annual bill credit. Participants will also be allowed to override two conservation periods per year.

COMBINED RESIDENTIAL/NON-RESIDENTIAL CUSTOMER PROGRAMS

ENERGY EFFICIENT LIGHTING PROGRAM

The Energy Efficient Lighting Program partners with lighting manufacturers and retailers across North and South Carolina to provide marked-down prices at the register to DEP customers purchasing energy efficient lighting products. Starting in 2017, the Program removed CFLs and only offers LEDs and energy-efficient fixtures.

As the program enters its eighth year, the DEP Energy Efficient Lighting Program will continue to encourage customers to adopt energy efficient lighting through incentives on a wide range of energy efficient lighting products. Customer education is imperative to ensure customers are purchasing the right bulb for the application in order to obtain high satisfaction with lighting products and subsequent purchases.



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