

August 31, 2020

**VIA Electronic Filing**

Ms. Kimberly A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

*Re: Petition for Approval of Revisions to Generator Interconnection Standards  
Docket No. E-100, Sub 101*

Dear Ms. Campbell,

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”) respectfully submits this letter in lieu of reply comments with regard to the Queue Reform Proposal submitted by Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC (“Duke”) in the above captioned docket on May 15, 2020. Ordering Paragraph 1 of the August 15, 2019 *Order Requiring Queue Reform Proposal and Comments* (“Order”) in the above-captioned docket directed that on or before October 15, 2019, Duke shall file a queue reform proposal consistent with the Order and DENC “may file a queue reform proposal at that time, if it so chooses.” Ordering Paragraphs 3 and 4 allowed all other parties to file a “statement of position relative to the queue reform proposal(s)” on November 8, 2019, and allowed Duke and DENC to file responsive comments by December 2, 2019.

On October 15, 2019, Duke filed a Queue Reform Update, including a Queue Reform Framework Summary, and a Motion to Delay the deadlines for the queue reform proposal and comments in order to allow for more time to analyze this process in Duke’s stakeholder groups. Also on October 15, 2019, DENC filed its Queue Reform Comments stating that the Company has reviewed Duke’s Queue Reform Framework Summary and DENC does not oppose it. Specifically, DENC stated that it does not take issue with Duke’s proposed collaborative effort to re-insert a grouping study option into the North Carolina Interconnection Procedures (“NCIP”) to address, in part, NCIP Section 1.8 interdependency challenges, but strongly recommended that implementation of any such grouping process be at the option of the Company.

On October 23, 2019, the Commission granted Duke's Motion to Delay and, after subsequent motions for extensions,<sup>1</sup> the Commission extended the deadline for the Queue Reform Proposal to May 15, 2020. The Public Staff and intervenors filed comments on Duke's Queue Reform Proposal on June 15, 2020.<sup>2</sup> On June 16, 2020, Duke filed a Motion for Extension of Time to File Reply comments until August 15, 2020, which the Commission granted.<sup>3</sup> On August 6, 2020, Duke, the North Carolina Clean Energy Business Alliance, and the North Carolina Sustainable Energy Association filed a Joint Motion for Additional Extension of Time to File Reply Comments until August 31, 2020, which the Commission also granted.<sup>4</sup>

Based on its review of the initial comments of other parties to this proceeding, the Company continues to support Duke's Queue Reform Proposal as it provides DENC the optionality to not implement a cluster study process. DENC continues to successfully administer the NCIP using the serial queue study process. Therefore, DENC submits this letter in lieu of reply comments to the Commission.

Very truly yours,

/s/Andrea R. Kells

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<sup>1</sup> See *Order Granting Extension of Time*, Docket No. E-100, Sub 101 (Feb. 26, 2020); *Order Granting Further Extensions of Time*, Docket No. E-100, Sub 101 (Mar. 27, 2020); *Order Granting Waiver and Requiring Report*, Docket No. E-100, Sub 101 (Apr. 28, 2020).

<sup>2</sup> See *Order Granting Extension of Time to File Comments*, Docket No. E-100, Sub 101 (June 1, 2020).

<sup>3</sup> See *DEC-DEP Motion for Extension of Time to File Reply Comments*, Docket No. E-100, Sub 101 (July 8, 2020); *Order Granting Further Extension of Time*, Docket No. E-100, Sub 101 (July 13, 2020).

<sup>4</sup> See *Joint Motion for Additional Extension of Time to File Reply Comments on Queue Reform Proposal*, Docket No. E-100, Sub 101 (Aug. 6, 2020); *Order Granting Further Extension of Time*, Docket No. E-100, Sub 101 (Aug. 13, 2020).

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Letter in Lieu of Reply Comments of Dominion Energy North Carolina* filed in Docket No. E-100, Sub 101 were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 31<sup>st</sup> day of August, 2020.

/s/Andrea R. Kells

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