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Chief Clerk, NC Utilities Commission  
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**Re: Docket Nos. E-100, Sub 121; E-100, Sub 145; E-2 Sub 1071; E-7, Sub 1074; E-22, Sub 525; E-100, Sub 113**

I was asked by North Carolina Utilities Commission staff to submit a description of corrections to 2013 retail sales that were input to NC-RETS in August of 2015. These changes caused NC-RETS to re-calculate the 2014 poultry requirement for all electric power suppliers.

NCUC rules require North Carolina electric power suppliers to report their previous year's retail sales into NC-RETS by June 1<sup>st</sup> of each year. The aggregate of all the reported retail sales is used by NC-RETS to calculate the poultry requirement for each North Carolina electric power supplier.

In August 2015, ElectriCities informed me that NCMPA1 and NCEMPA's retail sales reported for 2013 and 2014 needed to be updated in order to be accurate:

*"The 2013 load data was entered into NC-RETS by June 1<sup>st</sup>, 2014. However, our cities had not all provided their data by that time, so what was entered in at that point was the best we could do. Since then, the numbers have been updated and finalized, and no longer match the 2013 load data entered in NC-RETS."*

ElectriCities email on August 27, 2015

After reviewing all 2013 retail sales numbers that had been entered into NC-RETS, I noticed a number of electric power suppliers with possible discrepancies. I informed Jay Lucas of the Public Staff of the possible discrepancies, and he directed me to work with the electric power suppliers to correct them. The 2013 retail sales for four electric power suppliers have been changed, as shown below:

Electric Power Supplier	Original 2013 Retail Sales (MWh)	Updated 2013 Retail Sales (MWh)	Change
GreenCo Solutions, Inc.	12,373,073	12,363,411	-9,662
NCMPA1	5,125,199	4,855,329	-269,870
NCEMPA	7,291,696	6,924,830	-366,866
Tennessee Valley Authority	556,244.217	586,195.46	29,951

This net reduction in 2013 retail sales resulted in lower 2014 poultry obligations for some electric power suppliers (those whose re-stated 2013 sales went down), and increased 2014 poultry obligations for those whose 2013 sales figures were unchanged or had gone up. For example, in NC-RETS, the Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, compliance sub-accounts now reflect non-compliance relative to their 2014 poultry obligations by 344 and 230 RECs respectively.

NCEMPA also modified its 2014 retail sales to 7,118,072 MWh, which similarly caused all electric power suppliers to see a change in the poultry obligation assigned to them for 2015.

As of today, the poultry RECs residing in the 2014 compliance sub-accounts and the poultry adders for projects approved as S886 Eligible total 169,401, which is 599 RECs short of North Carolina's 170,000 poultry REC requirement for 2014. The total number of poultry RECs with a vintage of 2014 or earlier that exists within NC-RETS as of today is 32,250 from in-state, and 254,740 from out-of-state sources. (This excludes RECs that reside in 2014 Compliance Subaccounts.)

Last week I discussed these issues with North Carolina Utilities Commission General Counsel Sam Watson and other Commission staff members who requested that I provide this documentation as part of the record in the Commission's 2014 REPS compliance proceedings, as well as in the Commission's NC-RETS docket.

Please let me know if I can provide any additional information.

Sincerely,

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Cc: Tennessee Valley Authority; NCEMPA; NCMPA1; GreenCo Solutions, Inc.; Duke Energy Carolinas, LLC; Duke Energy Progress, LLC