

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 158

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of:
Biennial Determination of Avoided Cost
Rates for Electric Utility Purchases from
Qualifying Facilities – 2018

**REPLY COMMENTS OF NORTH
CAROLINA CLEAN ENERGY
BUSINESS ALLIANCE AND
NORTH CAROLINA
SUSTAINABLE ENERGY
ASSOCIATION IN REGARD TO
DUKE'S PROPOSED
REQUIREMENTS FOR
AVOIDANCE OF SISC**

Pursuant to the North Carolina Utilities Commission's ("Commission") *Order Requesting Comments on Proposed Requirements for Avoidance of SISC and Order Granting Extension of Time for Filing Initial and Reply Comments* in the above-referenced docket, the North Carolina Clean Energy Business Alliance ("NCCEBA") and the North Carolina Sustainable Energy Association ("NCSEA") respectfully submit the following reply comments in response to Duke Energy Progress, LLC ("DEP") and Duke Energy Carolinas, LLC's ("DEC") (collectively, "Duke") proposed Requirements for Avoidance of the Solar Integration Services Charge ("SISC").

NCCEBA and NCSEA filed initial comments on July 13, 2020. In their initial comments, NCCEBA and NCSEA noted that Duke's proposed Requirements for Avoidance of the SISC would require a Qualifying Facility ("QF") to (1) effectively buy two SISC meters capable of recording five-minute solar output data for the Facility (one owned by the QF and one owned by Duke); (2) collect five-minute output data for the

Facility; (3) input the Solar Volatility Metric calculations in an Excel spreadsheet template and then calculate the monthly solar volatility; and (4) attest on a monthly basis to the degree to which the QF has reduced solar volatility. In regard to the requirement that a QF must purchase two SISC meters capable of recording five-minute solar output data for the Facility, NCCEBA and NCSEA believe that it is unnecessarily burdensome for Duke to require the QF to perform SISC metering on its own in addition to paying for a separate revenue quality SISC Meter to be owned by Duke. NCCEBA and NCSEA would like to clarify the recommendation that they provided about this requirement in their initial comments. NCCEBA and NCSEA recommend that rather than requiring the QF to perform SISC metering on its own and also pay for a separate SISC Meter, Duke should replace the Facility's current revenue meter with a meter that is capable of both revenue service and recording the five-minute intervals necessary for the SISC calculations.

Respectfully submitted this 31st day July, 2020.

FOX ROTHSCHILD LLP

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing REPLY COMMENTS OF NORTH CAROLINA CLEAN ENERGY BUSINESS ALLIANCE AND NORTH CAROLINA SUSTAINABLE ENERGY ASSOCIATION have been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

This 31st day of July, 2020.

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