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May 4, 2021

Ms. Kimberley A. Campbell, Chief Clerk  
The North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-432

Re: Docket No. E-100, Sub 165

Honorable Clerk and Commissioners:

On March 1, 2021, the North Carolina Attorney General's Office (AGO) filed in the above-referenced dockets its initial comments on the Duke's Integrated Resource Plans. After careful review, the AGO has identified technical errors in the comments that need to be corrected. The AGO apologizes for these errors. They came to light in the preparation of discovery responses provided to Duke on April 21. The substance of the AGO's analysis and recommendations in the comments are unchanged.

The enclosed Corrected Comments and Attachment address the following:

- There is language in Section III.A of the initial comments that is confusing about the distinction between Duke's Earliest Practicable Retirement Dates and Duke's Most Economic Retirement Analysis. The Corrected Comments clarify the recommendation that Duke should first use a model to determine Duke's Most Economic Retirement Analysis and then, if there are practical constraints that delay economic retirements, prepare a detailed and transparent action plan supporting the Earliest Practicable Retirement Dates. Corrections appear on pages 8-9, 12, 16-17.
- The Corrected Comments address a misstatement regarding the operation of certain coal units that serve as standby, backup generation. Strategen advises that the units contribute electricity to the grid at times when they are operated in standby mode, and it is incorrect to say that they do not contribute any electricity at such times. Nonetheless the units burn coal and produce significant emissions when they operate as standby, backup generation. Corrections appear on pages 11-12.

- The Corrected Comments and Attachment correct minor miscalculations regarding what percentage of DEC's future energy needs through 2035 will be met by coal and the dollar amount of DEP's ongoing fixed costs to continue coal plant operations through 2035. Corrections appear on page 10 of the Corrected Comments (Confidential version) and pages 4 of the Corrected Attachment (Confidential version).

These corrections do not alter or change the arguments or recommendations made in the original Comments and Attachment.

By copy of this letter, I am forwarding a copy of the Public Version to all parties of record.

Yours very truly,

Electronically submitted  
/s/Margaret A. Force  
Special Deputy Attorney General  
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