



June 3, 2024

Ms. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699

RE: In the Matter of: Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Pursuant to N.C.G.S. § 62-110.9 and § 62-110.1(c) Docket No. E-100, Sub 190

Dear Ms. Dunston,

Attached for filing on behalf of the North Carolina Sustainable Energy Association (“NCSEA”) in the above referenced docket is NCSEA’s Index of Designated Issues, filed pursuant to the Commission’s February 21, 2024, *Order Establishing Additional Procedures for Expert Witness Hearing* and the Commission’s May 31, 2024, *Procedural Order*.

NCSEA greatly appreciates the opportunity to correct this oversight and for the additional guidance the Commission provided referencing model examples from other parties. Additionally, Appendix III, the Expert Report of Dr. John O’Brien and Philip O. Moor, P.E., provides a comprehensive table of contents to guide the Commission through the analyses and all the subtopics related to the review of Duke’s long-lead generation proposals.

Kind regards,

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Enclosures
cc: Parties of Record



Docket E-100, Sub 190

Index of Designated Issues for the Direct Testimony of Dr. John O’Brien and Philip Moor on behalf of the North Carolina Sustainable Energy Association

Designated Issue	Testifying Expert	Pages
8. Execution Plan	O’Brien/ Moor	<p><i>Appendix III:</i> Ch. 2.2 – Execution Risk, 13–54.</p> <ul style="list-style-type: none"> Summarizing execution risks of Duke’s proposed plans regarding offshore wind. <p>Ch. 3.2 – Execution Risk, 45–54.</p> <ul style="list-style-type: none"> Summarizing Execution risks of Duke’s proposed plans regarding new nuclear resources (SMRs & Advanced Nuclear).
9. Near-Term Actions: Supply-side Development and Procurement Activities		
f. Advanced Nuclear	Moor	<p><i>Direct Testimony:</i></p> <ul style="list-style-type: none"> 14–17 – summarizing recommendations & concerns related to Duke’s near-term actions and deployment schedule of new nuclear resources. <p><i>Appendix III:</i> Ch. 3.0, 44–58.</p> <ul style="list-style-type: none"> recommendations & concerns related to Duke’s near-term actions and deployment schedule of new nuclear resources.
g. Offshore Wind	O’Brien	<p><i>Direct Testimony:</i></p> <ul style="list-style-type: none"> 8–13 – summarizing recommendations for expediting & modifying the ARFI and authorization of ability to incur early development costs for offshore wind. <p><i>Appendix III:</i> Ch. 1.0, 3–7; Ch. 2.0, 10–14; Ch. 2.0, 10–44.</p> <ul style="list-style-type: none"> recommendations for expediting & modifying the ARFI and authorization of ability to incur early development costs for offshore wind.

12. Transmission System Planning and Grid Transformation		
b. Carolinas Transmission Planning Collaborative	O'Brien	<p><i>Appendix III:</i> Ch. 2.3.3, 35–36.</p> <ul style="list-style-type: none"> summarizing parallel efforts occurring at the CTPC to identify transmission needs and cost-effective points of interconnection for offshore wind.
13. Ensuring Reliability & Operational Resilience	O'Brien/ Moor	<p><i>Appendix III:</i> Ch. 2.3 – Reliability, 36–40.</p> <ul style="list-style-type: none"> Summarizing reliability concerns with Duke's proposed plans regarding offshore wind. <p>Ch. 3.3 – Reliability, 45–54.</p> <ul style="list-style-type: none"> Summarizing reliability concerns with Duke's proposed plans regarding new nuclear resources.
14. Requests for Relief and "Selection" of Resources to Execute Carbon Plan	O'Brien/ Moor	Overall, Appendix III to the Direct Testimony of Dr. John O'Brien & Philip O. Moor P.E., address this issue.

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing filing by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 3rd day of June, 2024.

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