

March 11, 2022

Via Electronic Filing

Ms. A. Shonta Dunston, Interim Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

Re: Docket No. E-100 Sub 175 – Response to New River Light and Power's Amended Proposed Rates and Contracts

Dear Ms. Dunston:

Appalachian Voices submitted comments on February 24, 2022, regarding New River Light and Power's Proposed Rates and Contracts. One of the issues addressed was New River's proposed administrative fee(s). Appalachian Voices raised legal and practical concerns regarding the fees, which would serve as a strong disincentive for customer-sited renewable energy. Appalachian Voices has reviewed New River Light and Power's Amended Proposed Rates and Contracts filed on March 1, 2022, which amends its December 21, 2021, filing to waive the proposed administrative fees, consistent with its practice in prior years. Appalachian Voices supports the withdrawal or waiver of the administrative fees, for the reasons set forth in its comments filed February 24, 2022.

The remaining issues identified in Appalachian Voices' comments filed February 24, 2022, relate to incorporating avoided transmission and distribution costs into New River's avoided cost rates, and ensuring opportunity for intervenor and public input regarding New River's anticipated filings later this year updating their avoided cost rates and contracts and any newly proposed net billing policy for its customers.

Sincerely,

Lauren J. Bowen

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N.C. State Bar No. 48835 Southern Environmental Law Center 601 West Rosemary St., Ste. 220 Charal Hill NC 27516

Chapel Hill, NC 27516

919-967-1450 lbowen@selcnc.org

Attorney for Appalachian Voices

cc: Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing comments by electronic mail.

This the 11th day of March, 2022.

/s/ Lauren J. Bowen
Lauren J. Bowen
N.C. State Bar No. 48835
Southern Environmental Law Center
601 West Rosemary St., Ste. 220
Chapel Hill, NC 27516
919-967-1450
lbowen@selcnc.org
Attorney for Appalachian Voices