

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1219
DOCKET NO. E-2, SUB 1280

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1219)	
)	
In the Matter of)	
Application by Duke Energy)	
Carolinas, LLC, for Adjustment of)	
Rates and Charges Applicable to)	
Electric Utility Service in North)	PUBLIC STAFF COMMENTS
Carolina)	ON PROPOSED PERMANENT
)	DYNAMIC RATE DESIGNS
)	
DOCKET NO. E-2, SUB 1280)	
)	
In the Matter of)	
Application of Duke Energy)	
Progress, LLC, for Approval of)	
Time of Use Rate Designs)	

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and responds to the October 12, 2021 Order of the Commission requesting comments on the petition (Petition) filed September 30, 2021, by Duke Energy Progress, LLC (DEP or the Company), for approval of two dynamic rate designs: Residential Service: Time of Use with Critical Peak Pricing Schedule "R-TOU-CPP" and Small General Service: Time of Use with Critical Peak Pricing Schedule "SGS-TOU-CPP," (collectively referred to as "TOU Schedules").

1. The Company indicates that the proposed TOU Schedules are nearly identical in structure to the TOU rate designs recently approved by the

Commission on August 25, 2021, in Docket No. E-7, Subs 1146 and 1253, for Duke Energy Carolinas, LLC (DEC). DEC's TOU rate designs were based on DEC's nine individual TOU pilots that were approved by Commission on July 2, 2019, in Docket No. E-7, Sub 1146.

2. The Public Staff has worked closely with DEP and DEC on the development of the TOU Schedules. The Public Staff monitored the progress of each of DEC's nine individual pilot rate schedules approved in Docket No. E-7, Sub 1146, and on June 15, 2021, filed comments recommending that the Commission approved DEC's request.

3. The Public Staff believes DEPs's proposed TOU rate designs can also produce meaningful beneficial shifts in energy consumption and behavior similar to DEC's TOU rate designs.

4. Finally, the Public Staff notes that DEP and DEC discussed the proposed TOU rate designs, including the period of peak hours, the number of days a critical peak period can occur, and other aspects of the proposed TOU Schedules with the Comprehensive Rate Design Collaborative.

5. Based on its review, the Public Staff believes the proposed TOU Schedules should be approved as filed.

Respectfully submitted this the ____ day of November, 2021.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
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CERTIFICATE OF SERVICE

I certify that a copy of this Response to Petition for Approval of Dynamic Rate Designs has been served on all parties of record or their attorneys, or both, in accordance with Commission Rule R1-39, by United States Mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the ____ day November, 2021.

Electronically submitted
/s/ Lucy E. Edmondson
Staff Attorney