



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

February 1, 2019

M. Lynn Jarvis, Chief Clerk
North Carolina Utilities Commission
Mail Service Center 4325
Raleigh, North Carolina 27699-4300

Re: Docket No. E-2, Sub 931; Docket No. E-7, Sub 1032 – Public
Staff's Motion to Establish Comment Cycle

Dear Ms. Jarvis:

In connection with the above-referenced dockets, I transmit herewith for filing on behalf of the Public Staff the attached Motion.

By copy of this letter, I am serving to all parties of record.

Sincerely,

Electronically Signed
/s/ Lucy Edmondson
Staff Attorney
lucy.edmondson@psncuc.nc.gov

Attachment

cc: Parties of Record

Executive Director
(919) 733-2435

Communications
(919) 733-2810

Economic Research
(919) 733-2902

Legal
(919) 733-6110

Transportation
(919) 733-7766

Accounting
(919) 733-4279

Consumer Services
(919) 733-9277

Electric
(919) 733-2267

Natural Gas
(919) 733-4326

Water
(919) 733-5610

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 931
DOCKET NO. E-7, SUB 1032

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 931

In the Matter of
Application by Carolina Power & Light Company, d/b/a
Progress Energy Carolinas, Inc., for Approval of
Demand-Side Management and Energy Efficiency Cost
Recovery Rider Pursuant to G.S. 62-133.9 and
Commission Rule R8-69

DOCKET NO. E-7, SUB 1032

In the Matter of
Application of Duke Energy Carolinas, LLC, for Approval
of New Cost Recovery Mechanism and Portfolio of
Demand-Side Management and Energy Efficiency
Programs

MOTION TO
ESTABLISH
COMMENT
CYCLE

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and requests that the Commission establish a comment cycle for initial and reply comments in order to review the Demand-Side Management and Energy Efficiency (DSM/EE) Incentive and Cost Recovery Mechanisms (Mechanisms) approved for Duke Energy Progress, LLC (DEP), and Duke Energy Carolinas, LLC (DEC), in Docket Nos. E-2, Sub 931, and E-7, Sub 1032, respectively. In support of this motion, the Public Staff respectfully shows the Commission:

1. On January 20, 2015, in Docket No. E-2, Sub 931, the Commission issued its *Order Approving Revised Cost Recovery Mechanism and Granting*

Waivers (2015 Sub 931 Order) wherein it approved changes to DEP's Mechanism and stated in Decretal Paragraph No. 7:

That the Public Staff shall initiate a formal review of the Company's Mechanism not later than February 1, 2019, unless requested to do so earlier by the Commission, the Company, or another interested party. The Public Staff's review should specifically address whether the incentives in the Commission-approved Mechanism are producing significant DSM and EE results; whether the customer rate impacts from the DSM/EE rider are reasonable and appropriate; whether overall portfolio performance targets should be adopted; and any other relevant issues that may be identified during the review process.

2. On August 18, 2017, in Docket No. E-7, Sub 1032, DEC, the North Carolina Sustainable Energy Association (NCSEA), the Southern Alliance (SACE), the South Carolina Coastal Conservation League (CCL), the Sierra Club, the Natural Resources Defense Council (NRDC), the Environmental Defense Fund (EDF), NC WARN, and the Public Staff filed a letter in lieu of comments stating that they did not propose changes to the DEC Mechanism at that time, but reserved the right to review the Mechanism and propose changes, possibly in conjunction with the review of DEP's Mechanism.

3. The Public Staff believes that due to the similarity between DEP and DEC's Mechanisms and DSM/EE programs, it would be appropriate to review both Mechanisms in the same proceeding.

4. The Public Staff proposes to initiate the review of the Mechanisms by moving the Commission to request from parties initial comments within 120 days of the Commission order and reply comments within 30 days thereafter regarding the issues listed in the 2015 Sub 931 Order, as well as any other issues relevant to review of the Mechanisms. Should any party propose changes to either

of the Mechanisms, the Public Staff recommends that those changes be presented by filing a redlined version of the DEP or DEC Mechanism as filed as Maness Exhibit I on September 4, 2018, in Docket No. E-2, Sub 1174, or as Maness Exhibit II on May 22, 2018, in Docket No. E-7, Sub 1164.

THEREFORE, the Public Staff prays:

1. That the Commission issue an order requesting initial comments within 120 days of the Commission's order and reply comments within 30 days of the submission date for initial comments on the following issues regarding both the DEP and DEC Mechanisms:

(a) Whether the incentives in the Commission-approved Mechanism are producing significant DSM and EE results;

(b) Whether the customer rate impacts from the DSM/EE rider are reasonable and appropriate;

(c) Whether overall portfolio performance targets should be adopted; and

(d) Any other relevant issues;

2. That the Commission order require that any proposed changes to either the DEP or DEC Mechanism be filed as a redlined version of Maness Exhibit I on September 4, 2018, in Docket No. E-2, Sub 1174, or as Maness Exhibit II on May 22, 2018, in Docket No. E-7, Sub 1164, respectively; and

3. That the Commission grant such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 1st day of February, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Lucy Edmondson
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
Email: lucy.edmondson@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 1st day of February, 2019.

Electronically submitted
/s/ Lucy Edmondson