



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

October 21, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. E-2, Sub 1257

Dear Ms. Campbell:

On October 21, 2020, the Public Staff filed the Testimony of Jeff Thomas. This filing inadvertently omitted Thomas Exhibit 1. Attached hereto for filing is Thomas Exhibit 1. This Exhibit is not confidential.

By copy of this letter, we are forwarding copies to all parties of record.

Sincerely,

Electronically submitted
/s/ John D. Little
Staff Attorney
john.little@psncuc.nc.gov

c: Parties of Record

Executive Director
(919) 733-2435

Accounting
(919) 733-4279

Consumer Services
(919) 733-9277

Economic Research
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Energy
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Transportation
(919) 733-7766

Water/Telephone
(919) 733-5610

NC Public Staff
Docket No. E-2, Sub 1257
Woodfin CPCN
NC Public Staff Data Request No. 2
Item No. 2-17
Page 1 of 1

DUKE ENERGY PROGRESS, LLC

Request:

Absent the Commission's *Order Granting Application In Part, With Conditions, And Denying Application in Part* in Docket No. E-2, Sub 1089 (Western Carolinas Modernization Project order), and taking into account the Commission's October 31, 2018 Order in Docket No. E-2, Sub 1185 in which the Commission states that a demonstration that the generation project meets the public convenience and necessity, does DEP believe this facility meets the public interest and necessity requirement? Please explain.

Response:

The Woodfin solar project meets the public interest and necessity requirement as it is implementing the Commission's directives in connection with the Western Carolinas Modernization Project (WCMP). The Company does not believe that it is relevant to this proceeding to speculate concerning other potential basis for satisfying the public interest and necessity.

Response provided by:
Larry Watson, Director Distributed Asset Commercial Development