



**NORTH CAROLINA  
PUBLIC STAFF  
UTILITIES COMMISSION**

November 17, 2023

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

Re: Docket No. E-7, Sub 1032 – Duke Energy Carolinas, LLC's Proposed Modifications to the Existing Commission-Approved PowerShare Nonresidential Load Curtailment Program

Dear Ms. Dunston:

On October 9, 2023, Duke Energy Carolinas, LLC (DEC or the Company), filed Proposed Modifications to the Existing Commission-Approved PowerShare Nonresidential Load Curtailment Program (Program) in the above-captioned docket pursuant to Commission Rule R8-68 (Modification Proposal).<sup>1</sup> The Program is intended to provide participants with billing credits for committing to reduce load during curtailment events as well as responding to load reduction requests. The Program is designed to target individually metered non-residential customers who can provide a minimum of 100 kW of load reduction for up to 100 hours annually on a voluntary basis. The Program currently offers an emergency Mandatory Curtailment Option.

In the Modification Proposal, DEC explained that, to increase participation in the Program, DEC is proposing a new economic curtailment option for customers enrolled in the Mandatory Curtailment Option. This addition introduces the Mandatory Plus Curtailment Option for non-emergency conditions. According to DEC, the new option will allow for greater participation and an additional opportunity for eligible customers to participate. The Program, as modified, would be slightly less cost-effective under the Utility Cost Test (from 4.77 in the existing Program to 4.18, as modified). However, the Company anticipates that the Program as modified would remain well above cost-effectiveness thresholds.

<sup>1</sup> The Program was initially approved on February 26, 2009.

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Ms. A. Shonta Dunston  
Page Two  
November 17, 2023

The Public Staff has reviewed the Company's Modification Proposal. The Public Staff concludes that the Program, as proposed in the Company's filings, has the potential to increase participation in the Program, is in the public interest, and should be approved as a "new" DSM Program pursuant to Commission Rule R8-68. As a result, the Public Staff recommends that the Commission (1) approve the Program modifications as set forth within the Modification Proposal; (2) order that the Program is eligible for consideration of recovery of Program costs; and (3) order that the appropriate recovery of costs and PPI associated with the Program will be determined in the annual DSM/EE rider proceedings consistent with N.C. Gen. Stat. § 62-133.9, Commission Rule R8-69, and the currently approved DSM/EE cost recovery mechanism.

By copy of this letter, I am forwarding a copy to all parties of record by electronic delivery.

Sincerely,

Electronically submitted  
/s/ Anne M. Keyworth  
Staff Attorney  
[anne.keyworth@psncuc.nc.gov](mailto:anne.keyworth@psncuc.nc.gov)

cc: Parties of Record

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