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May 15, 2020

VIA ELECTRONIC FILING

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

**RE: Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and North Carolina Clean Energy Business Alliance's Joint Motion for Extension of Time
Docket No. E-100, Sub 101**

Dear Ms. Campbell:

Enclosed for filing in the above-referenced docket, please find Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and North Carolina Clean Energy Business Alliance's Joint Motion for Extension of Time.

If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter.

Sincerely,

Jack E. Jirak

Enclosure

cc: Parties of Record

OFFICIAL COPY

May 15 2020

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 101

In the Matter of)
Petition for Approval of Revisions to)
Generator Interconnection Standards) JOINT MOTION FOR EXTENSION OF
) TIME TO OPEN ENROLLMENT
) WINDOW FOR ESS RETROFIT STUDY
) PROCESS

NOW COME Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke”) and the North Carolina Clean Energy Business Alliance (“NCCEBA” and together with Duke, “Joint Movants”) and, pursuant to Commission Rule R1-7, move the North Carolina Utilities Commission (“Commission” or “NCUC”) for a further extension of time to open the enrollment window for the Energy Storage System (“ESS”) Retrofit Study Process. As is explained further below, the Joint Movants request an extension through the date that is thirty days after the Commission’s order in response to the report to be filed by Duke and Dominion Energy North Carolina (“DENC”) concerning the energy storage stakeholder process initiated in the Commission’s April 15, 2020 *Order Establishing Rates and Contract Terms for Qualifying Facilities* in Docket No. E-100, Sub 158 (“*Sub 158 Avoided Cost Order*”).

In support of this Motion, the Joint Movants show the Commission the following:

1. The *Sub 158 Avoided Cost Order* concluded that it would be “inappropriate to compensate QFs for new capacity and energy at prior avoided cost rates under contracts that do not reflect current avoided costs and do not align price signals with the highest needed capacity windows.”¹ The Commission went on to consider the potential for

¹ *Sub 158 Avoided Cost Order*, at 120.

bifurcated avoided costs rates but noted that this approach “raises a multitude of challenging administrative and regulatory issues, including the development of metering and communication standards and new commercial PPA terms, that have not been fully considered in this proceeding.” Therefore, the Commission required Duke and DENC to establish a stakeholder process to “(a) identify critical issues that are barriers to the addition of energy storage to existing facilities, (b) develop solutions that will encourage deployment of energy storage, (c) further identify specific challenges that prevent the commercial viability, and (d) provide certainty to QFs that are considering the addition of an energy storage component to their electric generating facilities.”² Based on such stakeholder process, Duke and DENC are required to develop a report that addresses, among other issues, “appropriate avoided cost rates and terms of the PPA applicable to the energy storage element of an existing QF coupled with energy storage.”³

2. On April 28, 2020, the Commission issued its *Order Granting Waiver and Requiring Report* (“*ESS Study Retrofit Study Order*”) granting the Companies’ request for a waiver to implement the ESS Retrofit Study Process and directing Duke to open the first enrollment window on May 28, 2020.

3. Because there are important policy issues that remain unresolved related to the addition of energy storage to existing facilities, including crucially the appropriate avoided cost rates and terms that will be applied to energy storage additions, it is premature to open the ESS Retrofit Study Process because Qualifying Facilities (“QFs”) are not yet able to fully assess the economics of such a decision.

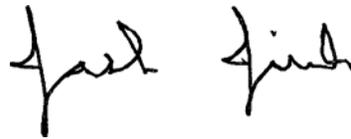
² *Id.*, at 131.

³ *Id.*, at 132.

4. Therefore, the Joint Movants request that the enrollment window for the ESS Retrofit Study Process be delayed until the date that is thirty days after the Commission's order in response to the report to be filed by Duke and DENC concerning the energy storage stakeholder process implemented in the *Sub 158 Avoided Cost Order* to open the enrollment window for the ESS Retrofit Study Process. The Public Staff has authorized the Joint Movants to represent that Public Staff is not opposed to this motion.

WHEREFORE, Duke and NCCEBA jointly request that the Commission grant this Motion for an Extension as described herein.

Respectfully submitted, this the 15th day of May, 2020.



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*Attorney for the North Carolina Clean
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CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and North Carolina Clean Energy Business Alliance's Joint Motion for Extension of Time, in Docket No. E-100, Sub 101, has been served by electronic mail, hand delivery, or by depositing a copy in the United States mail, postage prepaid, properly addressed to parties of record.

This the 15th day of May, 2020.

A handwritten signature in black ink, appearing to read "Jack Jirak", written in a cursive style.

Jack E. Jirak
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