

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Biennial Consolidated Carbon Plan and	)	
Integrated Resource Plans of Duke	)	<b>AVANGRID RENEWABLES,</b>
Energy Carolinas, LLC, and Duke	)	<b>LLC’S DESIGNATED ISSUES</b>
Energy Progress, LLC, Pursuant to	)	<b>TESTIMONY INDEX</b>
N.C.G.S. § 62-110.9 and § 62-110.1(c)	)	

Pursuant to North Carolina Utilities Commission’s (“Commission”) February 21, 2024 *Order Establishing Additional Procedures for Expert Witness Hearing* (“February Order”) and May 31, 2024 *Procedural Order* (“May Order”), Avangrid Renewables, LLC (“Avangrid Renewables” or “AGR”), an intervenor in the above-captioned proceeding, provides the Commission with the following Designated Issues Testimony Index applicable to the pre-filed Direct Testimony of Avangrid Renewables sponsored expert witnesses Jeffrey Bower (“Bower”) and Mical Nobel (“Nobel”) and Elizabeth Andrews (“Andrews”).

Avangrid Renewables appreciates the opportunity from the Commission to supplement its prefiled Direct Testimony with this Designated Issues Index and plan to present at the June 17, 2024 Intervenor Technical Conference to provide further information for the Commission to consider as it prepares for the Expert Witness Hearing and the remainder of this proceeding.

<u>Designated Issue</u>	<u>Testifying Expert(s)</u>	<u>Pages</u>
1. Planning Objectives in a Changing Energy Landscape		
2. Modeling (Methodology, Assumptions, and Other Modeling Issues)	AGR Direct Witness Bower	AGR Direct Witness Bower – pp. 13 – 16
3. Coal Unit Retirement Analysis		
4. Load Forecast	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 12 – 13.  AGR Direct Witness Bower – pp. 6 - 11
5. Planning Reserve Margin / 2023		
6. Natural Gas Supply and Hydrogen	AGR Direct Witness Bower	AGR Direct Witness Bower – p. 18
7. Pathways, Portfolios, and Portfolio Comparison and Evaluation	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 7 - 8; 13 – 14.  AGR Direct Witness Bower pp. 11 – 15, 16 – 17, 23 – 28.
8. Execution Plan	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 7 – 9.  AGR Direct Witness Bower pp. 11 – 12.
9. Near-Term Actions: Supply-Side Development and Procurement Activities		
a. Solar	AGR Direct Panel Witnesses Nobel/Andrews	AGR Direct Panel Witnesses Nobel/Andrews – pp. 12 – 13.

b. Battery Storage		
c. Onshore Wind		
d. New Gas	AGR Direct Witness Bower	AGR Direct Witness Bower – pp. 18 – 20.
e. Pumped Storage Hydro		
f. Advanced Nuclear	AGR Direct Witness Bower	AGR Direct Witness Bower – pp. 14 – 15.
g. Offshore Wind	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 2 – 30.  AGR Direct Witness Bower pp. 3 – 17, 20 – 30.
10. Near-Term Actions: Existing Resources		
a. Existing Gas Fleet (Flexibility Projects)		
b. Existing Nuclear (SLRs and Uprate Projects)		
11. Advancing Grid Edge and Customer Programs		
12. Transmission System Planning and Grid Transformation		
a. Strategic Transmission Additions / RZEP 2.0	AGR Direct Panel Witnesses Nobel/Andrews	AGR Direct Panel Witnesses Nobel/Andrews – pp. 14 – 20.
b. Carolinas Transmission Planning		
c. Regional / Interregional Transmission		

Planning Process		
13. Ensuring Reliability and Operational Resilience	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 14 – 18.  AGR Direct Witness Bower – pp. 20 - 23
14. Requests for Relief and “Selection” of Resources to Execute Carbon Plan	AGR Direct Panel Witnesses Nobel/Andrews  AGR Direct Witness Bower	AGR Direct Panel Witnesses Nobel/Andrews – pp. 7 – 9, 12 – 13, 23 – 30.  AGR Direct Witness Bower – pp. 4 – 6,
15. Dual State Planning for Carolinas		

Respectfully submitted this 5th day of June, 2024.

KILPATRICK TOWNSEND & STOCKTON LLP

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, first-class postage prepaid, properly addressed to parties of record.

This the 5th day of June, 2024.

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