



May 20, 2024

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

Re: CCEBA's Partial Proposed Order in 2023 Avoided Cost Docket

**In the Matter of:
Biennial Determination of Avoided Cost Rates for Electric
Utility Purchases from Qualifying Facilities — 2023**

Docket No. E-100, Sub 194

Dear Ms. Dunston:

As requested by the Commission's April 10, 2024, Order Requiring the Filing of Proposed Orders and Briefs and the May 7, 2024, Order Granting Motion for Extension of Time to File Proposed Orders, the Carolinas Clean Energy Business Association ("CCEBA") provides the attached Partial Proposed Order. By copy of this letter and the attached Proposed Order, CCEBA is serving all parties of record electronically.

CCEBA's Partial Proposed Order addresses the issue of alternatives to the "Peaker Method" for valuing the avoided costs and contributions of PURPA QF renewable resources. In addition, CCEBA has had the opportunity to review the Partial Proposed Orders submitted by the Southern Alliance for Clean Energy ("SACE") and the North Carolina Sustainable Energy Association ("NCSEA"). CCEBA endorses those Partial Proposed Orders and the relief requested therein.

Moreover, CCEBA has specifically reviewed Findings of Fact 1-5 (addressing the Battery Electric Storage System Retrofit) in the NCSEA Proposed Order and the supporting discussion, as well as NCSEA's proposal that the Commission "Direct the Companies to develop new predetermined ESS Retrofit avoided cost rates to

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be considered in the next biennial avoided cost proceeding, and to adopt NCSEA's proposed amended framework." CCEBA submits that, because such a process would necessarily involve consideration of the value and avoided costs of such projects, this discussion could be a part of the third party-supervised stakeholder process recommended in CCEBA's own Proposed Order.

We appreciate the opportunity to participate in this docket and thank the Commission for its consideration of these important issues.

Respectfully submitted,

/s/ John D. Burns

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