Poyner Spruill^{up}

May 7, 2018

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VIA ELECTRONIC FILING

M. Lynn Jarvis Chief Clerk N.C. Utilities Commission 430 North Salisbury Street Dobbs Building Raleigh, NC 27603-5918

RE: Docket No. E-34, Sub 46

Dear Ms. Jarvis:

Pursuant to Finds of Fact paragraph 39 and Ordering paragraph 8 of the Order Accepting Stipulation and Granting Increase in Rates, issued by the North Carolina Utilities Commission (the "Commission") on March 29, 2018, in the captioned Docket (the "Order"), and the Order Granting Extension of Time issued by the Commission on April 30, 2018, New River Light and Power Company ("NRLP") hereby files the attached Non-Standard Meter Rider, Schedule NSMR for review and approval by the Commission. Schedule NSMR has been reviewed and approved by the Public Staff.

The Commission currently has before it, in Docket No. E-7, Sub 1115, a request by Duke Energy Carolinas, LLC for approval of an AMI opt-out one-time fee and ongoing monthly rate. In that proceeding, the Public Staff has recommended, among other things, that the rate calculation be revisited in the utility's next general rate case and subsequent rate cases to determine whether a tariff change is needed to reflect actual participation to date, as well as other possible updates of initial assumptions. In addition, the Public Staff has recommended, in that proceeding, that if the Commission approves the proposed tariff, it require the utility to file periodic reports of the number of customers who have opted out of receiving an AMI meter. The Public Staff has recommended that NRLP agree to the foregoing recommendations in this proceeding as well. NRLP has no objections to these two recommendations of the Public Staff; with regard to the periodic report, NRLP and the Public Staff believe that an annual report will be sufficient. Additionally, NRLP agrees to update its website to provide information on the availability of the opt-out tariff (Schedule NSMR) once the Commission makes a ruling on the tariff. Finally, NRLP agrees that it is appropriate for the provisions of its policy and tariff to be revisited, if necessary, following the Commission's final order in

Docket No. E-7, Sub 1115, including NRLP's inclusion in any generic proceeding to review and revise the rules associated with metering and billing for electric utility service to accommodate the changing nature of that service.

NRLP respectfully requests that the enclosed be reviewed and approved by the Commission as soon as is convenient with the Commission.

Please direct any questions in connection with the above to the undersigned.

Thank you for your attention to this matter.

Sincerely,

/s/ Michael S. Colo
Michael S. Colo
Attorney for New River Light and Power

Attachments:

• Proposed Notice to Customers of Change in Rates

cc: Ed Miller Randy Halley

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing by electronic delivery to the following person at the following address which is the last address known to me:

Elizabeth D. Culpepper Staff Attorney Public Staff North Carolina Utilities Commission 430 N. Salisbury Street, Suite 5110 4326 Mail Service Center Raleigh, NC 27688-4300 elizabeth.culpepper@psncuc.nc.gov

Patrick T. Buffkin Staff Attorney North Carolina Utilities Commission 430 N. Salisbury Street, Suite 5110 4326 Mail Service Center Raleigh, NC 27688-4300 pbuffkin@ncuc.net

This the 7th day of May, 2018.

s/ Michael S. Colo Michael S. Colo