



October 18, 2021

Ms. Antonia Dunston, Interim Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: NCSEA's Letter in lieu of Initial Comments Responsive to CCEBA's
Petition to Initiate Resource Solicitation Cluster for CPRE Tranche 3
Docket Nos. E-2, Sub 1159; E-7, Sub 1156

Dear Ms. Dunston:

On October 13, 2021, the North Carolina Utilities Commission (the "Commission") issued the *Order Requesting Comments on Petition* ("Order") wherein the Commission requested comments responsive to Carolina Clean Energy Business Association's ("CCEBA") *Petition to Initiate Resource Solicitation Cluster for CPRE Tranche 3* ("Petition"). In the Petition, CCEBA requested the following relief from the Commission, in pertinent part:

1. Enter a Procedural Order directing Duke, the Public Staff, and other interested parties to file Responses to the Petition no later than October 18, 2021; and directing CCEBA to file a Reply in support of its Petition no later than October 22, 2021; and
2. Direct IA to implement CPRE Tranche 3 via a Resource Solicitation Cluster prior to the first DISIS cluster, as authorized by Section 4.4.2 of the NCIP; and
3. Engage with CCEBA and other stakeholders on the specific design of an RSC, using the RSC Proposal as a starting point; and
4. Award such other relief as the Commission deems just and proper.

In the Order, the Commission granted the first prong of CCEBA's requested relief by opening this comment period on the Petition. The following letter will serve in lieu of initial comments and is responsive to the Petition.

As an initial matter, NCSEA is encouraged by the discussion and open negotiation which has occurred in this docket recently. NCSEA believes that the participants are



working sincerely towards a solution. To that end, the Petition reflects, from NCSEA's perspective, a relatively simple solution to a complex problem and should be granted.

As detailed in the Petition (and elsewhere), the challenge of the next Competitive Procurement of Renewable Energy ("CPRE") procurement tranche is that former interconnection standards, as applied to the prior CPRE tranches, do not apply anymore. This is because, while the CPRE program has progressed, considerable work was done by parties and stakeholders in the interconnection docket (NCUC Docket No. E-100, Sub 101) to upgrade interconnection standards to enable the efficient connection of clean energy. This was a forward-thinking and worthwhile endeavor. However, despite stakeholder engagement and feedback with the utilities, these changes to the North Carolina Interconnection Procedures ("NCIP") did not adequately account for or accommodate properly the latest tranche of CPRE projects, especially given the statutory time limits of the CPRE.

Therefore, NCSEA supports the Petition of CCEBA. NCSEA believes that the proposed Resource Solicitation Cluster ("RSC") taking place prior to the initial Definitive Interconnection System Impact Study ("DISIS") will allow for a timely completion of the third tranche of the CPRE program. Moreover, NCSEA believes that the RSC process, as outlined by CCEBA, will allow for a procurement process in a manner materially consistent with the prior CPRE tranches, in the best interest of ratepayers, and, of course, consistent with the words and intent contained in N.C. Gen. Stat. § 62-110.8.



NCSEA looks forward to reviewing the initial comments on the Petition from the other participants in this docket and may elect to file more robust reply comments responsive to other parties' initial comments. In the meantime, however, NCSEA wishes express to the Commission its support of the Petition and support CCEBA's relief requested.

Sincerely,

/s/ Benjamin W. Smith
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cc: Parties of Record