

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
2021 Biennial Integrated Resource Plan	)	REPORT ON PUBLIC STAFF'S
Updates and Related 2021 REPS	)	REVIEW OF IRP UPDATES
Compliance Plans	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and submits the following report. On June 29, 2021, the Commission issued its Order Waiving in Part Rule R8-60(h)(2) and Giving Notice of Additional Proceedings in which it relieved Duke Energy Carolinas, LLC (DEC) and Duke Energy Progress, LLC (DEP) of their obligation to file updated 2021 Integrated Resource Plans (IRPs) under Rule R8-60(h)(2), with the exception of: (a) their Renewable Energy and Energy Efficiency Portfolio Standard (REPS) Compliance Plans as required by Rule R8-60(h)(4) and Rule R8-67(b); (b) their Competitive Procurement of Renewable Energy (CPRE) Program Plan update as required by Rule R8-71(g)(1); and (c) any material modifications to the short-term action plans identified in their 2020 biennial IRPs as would be required by Rule R8-60(h)(3) (June 29 Order).

On September 1, 2021, Dominion Energy North Carolina (DENC) filed its 2021 Update to the 2020 IRP pursuant to Commission Rule

R8-60(h)(2).<sup>1</sup> On the same day, DEC and DEP filed: (1) updates to their Short-Term Action Plan, (2) their 2021 REPS Compliance Plan, and (3) their 2021 CPRE Program Plan (collectively, the “2021 Duke IRP Update Filing”) pursuant to the June 29 Order.

Pursuant to Commission Rule R8-60(l), the Public Staff submits this report on the compliance of DENC, DEP, and DEC’s (collectively, “the utilities”) update reports with the requirements of Commission Rule R8-60(j) as modified in regard to DEC and DEP by the June 29 Order. The Public Staff reviewed DENC’s IRP update to ensure that it contains the following items:

- An updated 15-year forecast of native load requirements (including any off-system obligations approved for native load treatment by the Commission) and other system capacity or firm energy obligations extending through at least one summer or winter peak (other system obligations); supply-side (including owned/leased generation capacity and firm purchased power arrangements) and demand-side resources expected to satisfy those loads; and the reserve margin thus produced;
- A summary of any significant amendment or revisions to the most recently filed biennial report, including amendments or revisions to the type and size of resources identified, as applicable;

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<sup>1</sup> DENC filed Addendum 5, Statement of Undesignated Capacity Need, on September 8, 2021, and a corrected page 20 on September 20, 2021.

- A short-term action plan that discusses those specific actions currently being taken by the utility to implement the activities chosen as appropriate per the applicable biennial and update reports;
- The utility’s REPS compliance plan pursuant to Rule R8-67(b); and
- Data and tables for the planning horizon that provide the following:
  - Forecasts of load, supply-side resources, and demand-side resources, including a description of the methods, models, and assumptions used by the utility to prepare its peak load (MW) and energy sales (MWh) forecasts and the variables used in the models;
  - The utility’s forecast for at least a 15-year period, including peak loads for summer and winter seasons of each year, annual energy forecasts, reserve margins, and load duration curves, with and without projected supply or demand-side resource additions;
  - Where future supply-side resources are required, a description of the type of capacity/resource (MW rating, fuel source, base, intermediate, or peaking) that the utility proposes to use to address the forecasted need;
  - A list of existing units in service, with the following information for each unit for a 15-year period: type of fuel(s) used; type of unit (e.g., base, intermediate, or peaking); location of each existing unit; units to be retired from service with location, capacity and expected date

- of retirement from the system; units for which there are specific plans for life extension, refurbishment, or upgrading, and the expected (or actual) date removed from service, general location, capacity rating upon return to service, expected return to service date, and general description of work to be performed; and other changes to existing generating units that are expected to increase or decrease generation capability of the unit in question by an amount that is plus or minus 10%, or 10 MW, whichever is greater;
- A list of planned generation additions, the rationale as to why each listed generation addition was selected, and a 15-year projection of the type of fuel(s) used; type of unit (e.g., MW rating, baseload, intermediate, peaking); location of each planned unit to the extent such location has been determined; and summaries of the analyses supporting any new generation additions included in its 15-year forecast, including its designation as base, intermediate, or peaking capacity;
  - An updated list of all non-utility electric generating facilities in its service areas, including customer-owned and stand-by generating facilities, including the facility name, location, primary fuel type, and capacity (including its designation as base, intermediate, or peaking capacity), as well as which facilities are included in the utility's total supply of resources; and

- To the extent not covered by the previous requirements: the utility's load forecast adjusted for the impacts of any new energy efficiency programs; existing generating capacity with planned additions, uprates, derates, and retirements; planned purchase contracts; undesignated future resources identified by type of generation and MW rating; renewable capacity, demand-side management capacity, and any resource gap; cumulative resource additions necessary to meet load obligation, and reserve margins; and projections of load, capacity, and reserves for both the summer and winter periods.

For DEC and DEP, the Public Staff reviewed the companies' 2021 Duke IRP Update Filing to ensure that it contained the items specified by the June 29 Order.

Based on its review, the Public Staff has determined that DENC's update report meets the requirement of R8-60(k) and that the 2021 Duke IRP Update Filing complies with the June 29 Order. The Public Staff's determination that the IRP updates comply with R8-60(k) or the June 29 Order, as applicable, should not be construed to indicate that the Public Staff endorses any input or assumption utilized by any of the utilities in the development of their IRP updates or any forecast or plan. The Public Staff's recommendation simply indicates that the utilities have complied with all of the requirements of the rule or the June 29 Order, as applicable, for the purposes of the update year, and that the information utilized by the utilities appear to be reasonable for planning purposes.

Respectfully submitted, this the 1st day of November, 2021.

PUBLIC STAFF  
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Electronically submitted  
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CERTIFICATE OF SERVICE

I certify that a copy of this Report has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 1st day of November, 2021.

Electronically submitted  
s/ Lucy Edmondson