

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 180

IN THE MATTER OF:)	REPLY COMMENTS AND
)	STATEMENT OF SUPPORT
Investigation of Proposed)	FOR STIPULATION BY THE
Net Metering Policy Changes)	SOLAR ENERGY
)	INDUSTRIES ASSOCIATION

COMES NOW the Solar Energy Industries Association (“SEIA”), by and through counsel, pursuant to the Rules and Regulations of the North Carolina Utilities Commission (the “Commission”) and files the following statement of support of the Agreement and Stipulation of Settlement (“Stipulation”) for consideration by the Commission in the above captioned docket (the “Docket”) by Duke Energy Carolinas, LLC (“DEC”); Duke Energy Progress; LLC (“DEP”) (collectively, the “Companies”); Sundance Power Systems, Inc.; Southern Energy Management, Inc.; and Yes Solar Solutions (collectively, the “North Carolina Rooftop Solar Installers” and together with the Companies, the “Stipulating Parties”) filed in the Docket on May 19, 2022. SEIA commends the Stipulating Parties and the Companies for engaging in the constructive dialogue that resulted in the Stipulation.

As outlined in SEIA’s initial comments filed on March 15, 2022 in the above-captioned Docket, SEIA maintains that cost-effective customer-sited demand-side and energy efficiency programs will have a significant role to play in allowing the Commission to fulfill its mandate to achieve its statewide decarbonization goals. Further, SEIA believes that the above-referenced Stipulation is additive to the original program structure described in the Smart Saver Solar Energy Efficiency Programs (“Solar Efficiency Incentive”) and

that the Stipulation allows greater flexibility and consumer choice for customers looking to adopt solar in Duke's service territory in North Carolina.

The Stipulation allows the solar industry the additional time that is needed to alter its business models and practices to accommodate new and innovative tariff structures through the proposed bridge rate. Building in some additional time for a smooth and thoughtful transition helps to avoid a sudden, negative disruption to the existing rooftop solar market as consumers become educated about the new options and companies adjust the way they market any new policy. While SEIA is supportive of new TOU rate structures such as those proposed in the Solar Efficiency Incentive, the iterative approach and transition to the new rate described in the Stipulation allows both smaller and larger rooftop solar companies the time to adjust their business infrastructure to accommodate these new offerings.

SEIA is also supportive of expanding program offerings to both electric and gas heating customers, thereby at least doubling the existing market for potential adopters and expanding the program to an even wider range of participants. Engaging all segments of the residential class will increase in importance as demand-side and energy efficiency offerings become load-bearing pillars of the Companies' recently-filed Carolinas Carbon plan. The Stipulation and the Solar Efficiency Incentive is also an important means to meeting the carbon reduction goals contemplated in H.B. 951. H.B. 951 and other energy policies demand the Commission take a "no holds barred" approach to energy program development, and nowhere is this more critical than in the hands of actual energy consumers.

Approving this Stipulation, as well as any Solar Efficiency Incentive program within the broader umbrella of demand-side consumer programs, would signal the importance that these systems and their functions play in transitioning North Carolina's energy economy to one that is cleaner and more resilient, while creating greater agency for consumers when it comes to choosing the sources of their energy. SEIA continues to believe that this program is only a first step in a broader overhaul of demand-side consumer programs that should strive to unlock the total value of rooftop solar + storage systems paired with grid-reactive devices, such as smart thermostats or advanced inverters.

SEIA appreciated the opportunity to file these reply comments and statement in support of the Stipulation and looks forward to working with the various parties and the Commission in this Docket.

Respectfully submitted this 20th day of May, 2022.

/s/ James C. "Cal" Cunningham III
James C. "Cal" Cunningham III
N.C. Bar No. 27216

Cunningham Law, PLLC
Two Hannover Square
434 Fayetteville Street, Suite 2330
Raleigh, North Carolina 27601
Direct: (919) 295-2270
Email: Cal@CalCunninghamNC.com

Counsel for Solar Energy Industries Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Reply Comments and Statement of Support for Stipulation by the Solar Energy Industries Association as filed today in Docket No. E-100, Sub 180 has been served on all parties of record on the official service list by electronic mail transmission, where parties have consented to electronic service, or by deposit in the U.S. Mail, first class, postage prepaid, on this day, May 20, 2022.

/s/ James C. "Cal" Cunningham III
James C. "Cal" Cunningham III
N.C. Bar No. 27216

Cunningham Law, PLLC
Two Hannover Square
434 Fayetteville Street, Suite 2330
Raleigh, North Carolina 27601
Direct: (919) 295-2270
Email: Cal@CalCunninghamNC.com

Counsel for Solar Energy Industries Association