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March 15, 2024

VIA ELECTRONIC FILING

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

**RE: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's
Motion to Consolidate
Docket Nos. E-100, Sub 190; E-2, Sub 1318; E-7, Sub 1297**

Dear Ms. Duston:

Enclosed for filing in the above-referenced dockets is Duke Energy Carolinas, LLC's ("DEC") and Duke Energy Progress, LLC's ("DEP," and together with DEC, "Companies") Motion to Consolidate ("Motion"), seeking consolidation of the 2023-2024 Carbon Plan and Integrated Resource Plan docket (Docket No. E-100, Sub 190) ("CPIRP Docket") and the two dockets involving the Companies' applications for a Certificate of Public Convenience and Necessity ("CPCN") (Docket Nos. E-2, Sub 1318 and E-7, Sub 1297) (the "CPCN Dockets" and together with the CPIRP Docket, the "Dockets") in an effort to promote regulatory efficiency.

As explained in the Motion, on March 14, 2024, DEC filed its application for a CPCN to construct two hydrogen capable, advanced-class combustion turbines ("CT") units at the site of its existing Marshall Steam Station, and DEP anticipates filing its application on March 28, 2024 for a CPCN to construct an approximately 1,360 megawatt advanced-class combined-cycle gas turbine unit at the site of its existing Roxboro Steam Plant. The Companies believe the significant overlap of factual and legal issues that the Commission will consider in these three proceedings warrants consolidation of the Dockets and development of a consolidated evidentiary record for all three proceedings. Parties to all three Dockets would benefit from this procedural step as it would significantly conserve time and resources. As such, the Companies believe consolidation is appropriate.

The Motion also presents for the Commission's consideration a comprehensive proposed schedule that reflects the procedural schedule already established by the Commission for the CPIRP Docket and includes an orderly and staggered timeline for key filing dates for the CPCN Dockets.

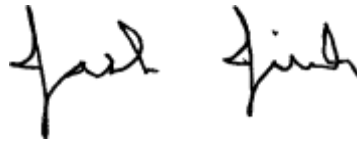
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If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack E. Jirak". The signature is written in a cursive style with a large initial "J" and "E".

Jack E. Jirak

Enclosure

cc: Parties of Record

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 190
DOCKET NO. E-2, SUB 1318
DOCKET NO. E-7, SUB 1297

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)
Biennial Consolidated Carbon Plan and)
Integrated Resource Plans of Duke Energy)
Carolinas, LLC, and Duke Energy)
Progress, LLC, Pursuant to N.C.G.S. § 62-)
110.9 and § 62-110.1(c))

In the Matter of)
Application of Duke Energy Progress, LLC)
to Construct New Natural Gas-Fueled)
Combined Cycle Combustion Turbine Units)
at Existing Electric Generating Facility in)
Person County, NC)

In the Matter of)
Application of Duke Energy Progress, LLC)
to Construct New Natural Gas-Fueled)
Simple-Cycle Gas Combustion Turbine)
Units at Existing Electric Generating)
Facility in Catawba County, NC)

**DUKE ENERGY CAROLINAS,
LLC’S AND DUKE ENERGY
PROGRESS, LLC’S MOTION TO
CONSOLIDATE**

NOW COME, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and, together with DEC, the “Companies”), by and through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”), and hereby move the Commission to consolidate the three above-captioned dockets (the “Dockets”).

On March 14, 2024, DEC filed its Application for a Certificate of Public Convenience and Necessity (“CPCN”) to construct the Marshall combustion turbines (“CTs”)¹ and DEP is targeting March 28, 2024 for its application for a CPCN to construct the Roxboro combined cycle unit (“CC”).² The Companies file this Motion at this time in parallel with the Marshall CPCN application in expectation that the Commission will move expeditiously to set the procedural schedule for the Marshall CPCN proceeding and then will establish the procedural schedule for the Roxboro CPCN proceeding after the Roxboro CPCN application is filed.

Consolidation of the Dockets will result in substantial efficiency from an evidentiary perspective, particularly in light of the significant overlap between the determinations to be rendered in the 2023-2024 Carbon Plan and Integrated Resource Plan (“CPIRP”) docket (Docket No. E-100, Sub 190 (“CPIRP Docket”)) and the two CPCN dockets (Docket Nos. E-2, Sub 1318 and E-7, Sub 1297 (the “CPCN Dockets” and together with the CPIRP Docket, the “Dockets”)). The inter-related nature of the Dockets was only further strengthened by recently enacted changes to N.C.G.S. § 62-110.1. Under these changes, the issuance of a CPCN is dependent on whether the resource is consistent with the CPIRP. As a result, the Commission’s determinations in the pending CPIRP Docket (in addition to its determination in its December 30, 2022 *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning* issued in Docket No. E-100, Sub 179

¹ On November 1, 2023, DEC filed in Docket No. E-7, Sub 1297 a pre-CPCN application for 2 new CT units at the Marshall Energy Complex,

² On September 1, 2023, DEP filed in Docket No. E-2, Sub 1318 preliminary plans (“pre-CPCN application”) to construct a new advanced class CC at the existing Roxboro Steam Plant in Semora, North Carolina. The comprehensive schedule set forth in Exhibit A assumes the submission of the Roxboro Application on March 28, 2024, which is the Companies’ target absent any unforeseen circumstances.

(“Carbon Plan Order”))³ will directly inform and guide its determinations in the pending CPCN dockets, and there are substantially overlapping questions of law and fact among the Dockets.

Finally, regardless of whether the Commission consolidates the Dockets, a comprehensive schedule is needed to establish an orderly and staggered timeline for key filing dates for the Dockets. Given the number of filing deadlines associated with each of the three Dockets, there will be periods in which filing deadlines are unavoidably compressed. However, the proposed schedule submitted as Exhibit A to this Motion provides the Commission an orderly schedule for receiving the evidence in the Dockets while, at the same time, balancing the interests of all parties and avoiding overlapping filing deadlines.

As the Commission has acknowledged, execution of the CPIRP will require decisive and efficient activities, both in terms of the regulatory processes and the Companies’ on-the-ground execution.⁴ To date, the Commission, the Companies, and all parties have all worked diligently to make meaningful progress on CPIRP execution, including through approval of the initial Carbon Plan, the completion of two major solar procurements, evaluation of offshore wind costs, review and approval of Carbon Plan

³ As is noted in the application, the Marshall CPCN is justified and supported by both the Commission’s initial Carbon Plan order in Docket No. E-100, Sub 179 and the Companies’ currently pending CPIRP. In this case, in light of the alignment of the timing of the CPCN and 2023 -2024 CPIRP proceedings, it is reasonable for the Commission to align the CPCN and CPIRP proceedings. However, the Companies note that there may be future circumstances in which it is necessary to rely on the Commission’s most recently issued Carbon Plan order (and potentially a pending CPIRP filing) rather than waiting and attempting to align such CPCN proceeding with a future parallel CPIRP proceeding.

⁴ See Carbon Plan Order at 80-81 (quoting the Companies’ statement that “the accelerated timeframe to deliver new resources, along with the interdependencies between generation and transmission needed to achieve the target in-service dates presented in the Carbon Plan, underscores the importance of Commission approval and support for near-term Execution Plan activities in this initial Carbon Plan.”).

related investments in the recent rate cases, execution of the red zone transmission expansion projects, and other major activity. But the need for decisive and efficient action has been further heightened in light of the increases in the Companies' recent Updated 2023 Fall load Forecast. The requested consolidation is one small, but important step to find greater efficiencies to aid timely execution of the CPIRP.

In support of this Motion, the Companies show as follows:

I. LEGAL FRAMEWORK, PROCEDURAL BACKGROUND, AND STANDARD FOR REVIEW

The three Dockets are inextricably related. The Companies' proposed CPIRP presents the Companies' current assessment of the "*the least cost path . . . to achieve compliance with the authorized carbon reduction goals,*" required under N.C.G.S. § 62-110.9, while ensuring that all "*generation and resource changes maintain or improve upon the adequacy and reliability of the existing grid.*"⁵ Under the recently enacted amendments in Session Law 2023-138 ("SB 678"), the statutory standard for issuance of a CPCN relies on essentially the exact same language as is used in N.C.G.S. § 62-110.9. Namely, newly revised N.C.G.S. § 62-110.1 specifies that a CPCN is to be granted only where "the facility is part of *the least cost path to achieve compliance with the authorized carbon reduction goals* in G.S. 62-110.9, will *maintain or improve upon the adequacy and reliability of the existing grid*, and that the construction and operation of the facility is in the public interest."⁶ As is shown in the italicized language, the criteria guiding the

⁵ N.C.G.S. § 62-110.9 (emphasis added).

⁶ N.C.G.S. § 62-110.1 (emphasis added).

Commission under N.C.G.S. § 62-110.9 is effectively the same as the criteria used under the newly revised N.C.G.S. § 62-110.1 to consider a CPCN application.⁷

The Commission’s Carbon Plan Order held that it was reasonable for the Companies to plan for 800 MW of new CTs and a CC of up to 1,200 MW.⁸ The Companies’ 2023 CPIRP Near-Term Action Plan identifies the need for additional CTs and CCs beyond what was approved in the initial 2022 Carbon Plan.⁹ Explaining the increase, the CPIRP underscores that adding new dispatchable generation is necessary to ensure the Companies can maintain or improve reliability and meet the planning reserve margin, while proceeding with orderly retirement of coal-fired generation to meet the carbon reduction targets of N.C.G.S. § 62-110.9.¹⁰ As further explained in the CPIRP, adding replacement generation at retiring coal sites is imperative to provide necessary grid support to ensure continued reliability.¹¹

The Commission generally applies a “good cause” standard when considering motions to consolidate, and consolidation is generally appropriate when two or more proceedings involve common questions of law or fact.¹² The Commission has previously

⁷ The CPIRP and CPCN Dockets are subject to different statutory procedural timelines. In sum, N.C.G.S. § 62-82(a) requires the Commission to prioritize CPCN proceedings, commence any hearing on a CPCN application within three months of the application filing date, and render a decision within 60 days after submission of the parties’ briefs and arguments. With respect to the CPIRP, N.C.G.S. § 62-110.9(1) requires the Commission to review and adjust as necessary the Carbon Plan every two years, and Commission Rule R8-60(a)(g) requires the Commission to issue an order adopting the next CPIRP update by December 31 of the year after which the utility files its proposed CPIRP.

⁸ Carbon Plan Order at 79.

⁹ CPIRP Ch. 4 (Execution Plan) at 10-11.

¹⁰ CPIRP Ch. NC (CPIRP Update) at 8, 10.

¹¹ CPIRP Ch. 4 (Execution Plan) at 32.

¹² Order Consolidating Application for Rate Increase with Application to Modify and Implement Conservation Programs and Requiring Filing by Public Service Company of North Carolina, Inc., (“PSNC”) Docket Nos. G-5, Sub 632, G-5, Sub 634 (May 18, 2021) (finding good cause and granting the Public Staff’s motion to consolidate PSNC’s conservation program proceeding with its general rate case); Order to Show

authorized consolidation of (1) proceedings involving the same statutory framework,¹³ and (2) proceedings involving procedurally distinct yet directly related statutes.¹⁴ In granting such motions, the Commission has held that “[c]onsolidation of two proceedings is a matter of discretion[.]”¹⁵

II. MOTION TO CONSOLIDATE DOCKETS

The significant overlap of factual and legal issues that will be considered and decided in the Dockets is good cause for the Commission to consolidate the Dockets, resulting in a consolidated evidentiary record for all three proceedings. Creating a consolidated evidentiary record will foster regulatory efficiency and economy by utilizing the Commission’s, parties’, and the Companies’ resources in the most efficient manner.

A. Common Issues of Law and Fact and the Interconnected Nature of the CPIRP and CPCN Proceedings Provide Good Cause to Consolidate the Dockets.

As highlighted above, the inextricably interrelated statutory requirements of the CPIRP and CPCN proceedings warrant consolidation of the Dockets. Fundamentally, the Commission’s consideration of CPCN applications is driven by assessment of need under the CPIRP, as directed by N.C.G.S. §§ 62-110.1(c) & (e) and the Commission’s development of a plan and selection of resources under N.C.G.S. § 62-110.9. Given the

Cause, Consolidate Dockets, Schedule Expert Witness Hearing, Grant Withdrawal of Counsel, and Require Public Staff Participation, Docket Nos. W-1125 and Sub 9, W-1125, Sub 10 (June 28, 2022) (consolidating “based on the same root cause and similarity of issues contained in each complaint”); Order Ruling on Objection to Consolidation and Request for Reconsideration, Docket Nos. T-4176, Sub 1 and T-4176, Sub 2 (Oct. 16, 2003) (consolidating, in part, based on common factual issues).

¹³ See e.g., Order Consolidating Applications for Hearing, Scheduling Hearings, Establishing Procedural Deadlines, and Requiring Public Notice, Docket Nos. E-7, Sub 791 and E-7, Sub 832 (Jan. 23, 2008) (consolidating DEC’s CPCN applications for Buck and Dan River CC projects).

¹⁴ See e.g., Order Consolidating Dockets, Docket Nos. E-7, Sub 1134, E-7, Sub 1276 (July 11, 2023) (consolidating DEC’s CPCN application with its rate case).

¹⁵ Order Ruling on Objection to Consolidation and Request for Reconsideration, Docket Nos. T-4176, Sub 1, T-4176, Sub 2 (Oct. 16, 2003).

significant overlap of legal and factual issues and the interrelated nature of CPIRP and CPCN statutes, regulatory efficiency would be served by granting the Companies' Motion. Accordingly, good cause exists to consolidate the Dockets and develop a consolidated evidentiary record.

Factually, the question of the most reasonable, least cost portfolio of resources to execute the Companies' continued energy transition will be a contested issue in all three Dockets given that new natural gas-fueled generation plays a direct role in the orderly retirement of coal units and the replacement capacity that will be needed to reliably serve customers' future energy needs on the least cost path towards carbon neutrality in North Carolina. Indeed, the Commission has previously recognized the interrelated nature of evidence between CPIRP and CPCN proceedings. In its initial Carbon Plan Order, the Commission confirmed that it would give "substantial weight" to the selection of new gas-fired generating resources as evidence of need for new CCs/CTs to retire coal resources and to continue an orderly energy transition consistent with the mandates of N.C.G.S. § 62-110.9.¹⁶

The Commission has also found that the Carbon Plan itself is a factor in determining need for the generating facility in question.¹⁷ In the CPIRP, the Companies' Near-Term Action Plan identifies that new dispatchable natural gas-fueled resources are needed under all of the resource portfolios to help achieve the orderly retirement of 8,400 MW of coal-fired capacity, while maintaining or improving system reliability consistent

¹⁷ Carbon Plan Order at 79 ("If and when Duke applies for a CPCN for any new natural gas-fired generating facility, the Commission will evaluate the need for the facility, using this 2022 Carbon Plan as one factor in determining the need.").

with the mandates of N.C.G.S. § 62-110.9.¹⁸ Therefore, the Commission will inevitably examine the CPIRP itself in its determination of the need for the generating facilities.

In sum, all three Dockets will require the Commission to evaluate similar factual and legal issues and therefore, consolidation is appropriate.

B. Consolidation of the Dockets Will Result in a Consolidated Evidentiary Record That Will Promote Regulatory Efficiency and Conserve the Commission's, Parties', and Companies' Resources and Time.

Consolidation of the Dockets will result in a consolidated evidentiary record that will promote regulatory efficiency.¹⁹ As discussed above, there is substantial overlap in the factual and legal issues to be considered in the Dockets. However, without consolidation of the Dockets, the Companies and interested parties will be required to duplicate factual evidence and legal arguments in all three Dockets.

As a simple example, it is likely that factual disputes about future natural gas commodity and transportation costs will be presented to the Commission in the CPIRP Docket, just as such issues were contested before the Commission in the initial Carbon Plan docket. Those issues were and will continue to be central factual determinations in the Commission's CPIRP evaluation of the "*the least cost path...to achieve compliance with the authorized carbon reduction goals*" required under N.C.G.S. § 62-110.9 and will similarly be central factual determinations in the Commission's CPCN evaluation of whether the "the facility is part of *the least cost path to achieve compliance with the authorized carbon reduction goals* in G.S. 62-110.9." It would be highly inefficient to

¹⁸ CPIRP Ch. 4 (Execution Plan) at 12-13, 28.

¹⁹ To promote "regulatory efficiency" between related proceedings, the Commission has recently directed the consolidated presentation and consideration of the Companies' biennial proposed Carbon Plan under N.C.G.S. § 62-110.9 and IRPs under N.C.G.S. § 62-110.1(c). Carbon Plan at 33, 130.

require parties to present the exact same factual and legal arguments on such issues separately in the three Dockets. Instead, through consolidation of the Dockets, the consolidated evidentiary record would apply to all three Dockets. Common factual and legal issues (of which there will be many) may then be considered by the Commission just once. Those more limited factual issues specific to the CPCN Dockets can be separately explored as necessary. No party would be deprived of an opportunity to present any evidence or to cross examine any witness with respect to any issue relevant to any of the Dockets.

An alternative approach in which the Dockets are not consolidated, and separate evidentiary records are developed, would be inefficient. And as the Commission and parties experienced in the context of the recent DEC rate case proceeding in Docket No. E-7, Sub 1276, attempting to “import” evidence from an unconsolidated docket into another docket is generally not feasible due to a host of procedural and equitable considerations.²⁰ In the absence of consolidation, the Commission and parties would be forced to duplicate evidence and replicate legal arguments in all three Dockets. With consolidation, the combined evidentiary record will result in substantial efficiency.

In summary, because the Dockets involve common questions of law and fact, the Commission should exercise its discretion to consolidate the Dockets. A consolidated proceeding will promote regulatory efficiency and would not place any party at a disadvantageous position. Therefore, good cause exists for the Commission to grant the Companies’ Motion.

²⁰ See Transcript of Hearing Held in Raleigh, NC on Monday, August 28, 2023, Vol. 7, at 25-33, Docket No. E-7, Sub 1277 (Sept. 5, 2023).

C. **The Commission Could Determine How Best to Structure the Combined Evidentiary Hearing.**

If the Commission authorizes consolidation of the Dockets, the Commission would still retain discretion regarding scheduling separate public hearings and various related procedural matters and can issue separate orders regarding the three Dockets.²¹ Regarding the evidentiary hearing, the Commission would retain discretion with respect to procedure. The Companies' recommended approach would be that all CPIRP witnesses would be presented first, followed by all CPCN witnesses (with Marshall CPCN witnesses first, followed by Roxboro CPCN witnesses). This approach would allow for the consideration of all issues germane to the CPIRP Docket first, many of which will be directly relevant to the CPCNs. Thereafter, the CPCN witnesses would be presented, allowing for the consideration of all issues germane to the CPCN Dockets, but not requiring the duplication of testimony or cross examination already received in the CPIRP proceeding. Alternatively, if the Commission's schedule so requires, the Commission could choose to schedule a pause after conclusion of the CPIRP proceedings, leaving the expert hearing open and then resuming the hearing with all CPCN witnesses still in the same consolidated evidentiary hearing but at a later date.

While N.C.G.S. § 62-82(a) provides unique procedural and scheduling requirements for a CPCN proceeding, as is noted in the Companies' recommended

²¹*State ex rel. Utilities Comm'n v. Piedmont Nat. Gas Co.*, 346 N.C. 558, 573, 488 S.E.2d 591, 601 (1997) (stating “[t]he Commission has been given the authority and responsibility for regulating public utilities, and in doing so it is allowed to exercise its discretion and judgment. The procedure before the Commission is relatively informal; and the Commission, in the absence of any statutory inhibition, may regulate its own procedures and adopt reasonable rules and regulations.”); *Cube Yadkin Generation, LLC v. Duke Energy Progress, LLC*, 269 N.C. App. 1, 8, 837 S.E.2d 144, 148–49 (2019) (citing N.C. Gen. Stat. § 62-60 (2017)) (internal citations and quotations omitted) (stating “[w]hen the Commission issues an order, it is acting in a judicial capacity and shall render its decisions upon questions of law and of fact in the same manner as a court of record. However, ordinarily, the procedure before the Commission is more or less informal, and is not as strict as in superior court, nor is it confined by technical rules.”).

schedule, the Companies would not object to a schedule in which the CPCN evidentiary hearings are slotted after the CPIRP evidentiary hearing. The Companies also note that they would not object should the Commission choose to align the timing of decisions in the CPCN Dockets with the decision in the CPIRP dockets (though in separate orders).

D. The Commission Should Adopt the Companies' Recommended Schedule for All Three Dockets.

The Companies have provided in Exhibit A to this Motion a recommended coordinated procedural schedule for all three Dockets which reflects the procedural schedule already established by the Commission for the CPIRP Docket. Regardless of whether consolidation is granted, an aligned schedule is necessary for efficient procedural management of the three Dockets. The Companies' proposed schedule avoids a scenario in which major filing deadlines directly overlap. The proposed schedule also seeks to balance the interest of all parties and ensure the Commission has sufficient time to receive and consider evidence. There are still certain unavoidable periods involving some schedule compression, but the schedule generally seeks to allocate a reasonable and similar amount of time to parties for each respective phase of the CPCN Dockets. As noted above, the timelines are more extended than would typically be required for CPCN proceedings under N.C.G.S. § 62-82(a).

In light of the nature of the overlapping issues and as discussed above, the Companies believe that it will be substantially more efficient in the evidentiary hearing to receive all CPIRP testimony first before receiving the CPCN testimony. For this reason, as presented in Exhibit A, the Companies request the Commission commence the evidentiary hearing for the Marshall CTs CPCN and Roxboro CC CPCN proceedings after

the CPRIP in order to facilitate such sequencing, even though such schedule would extend beyond three months after the CPCN applications have been filed.²²

III. POSITIONS OF PUBLIC STAFF AND INTERSTED PARTIES ON MOTION AND PROPOSED PROCEDURAL SCHEDULE

Counsel for the Companies sought all parties' position on the proposed consolidation of the Dockets and requested feedback on the proposed CPCN testimony filing dates (highlighted in yellow) in Exhibit A. The parties' positions are as follows:

- The North Carolina Attorney General's Office, Carolina Utility Customer Associations, Inc., TotalEnergies Renewables USA, LLC, Environmental Defense Fund, Avangrid Renewables, LLC, Carolina Industrial Group for Fair Utility Rates II and the Carolina Industrial Group for Fair Utility Rates III, and the Public Staff – North Carolina Utilities Commission took no position on the Motion.
- Southern Environmental Law Center, North Carolina Sustainable Energy Association, EDF, Avangrid, Carolinas Clean Energy Business Alliance, and Clean Energy Buyers Association expressed reservations about the procedural schedule in the Motion.

The Companies note that it was only able to provide parties' a single business day for feedback and a number of parties expressed a desire for more time to consider the proposed consolidation and schedule. Recognizing that the Commission may proceed with establishing a procedural schedule for the now-filed Marshall CTs CPCN proceeding, the

²² See N.C.G.S. § 62-82(a) (prescribing that "Any such hearing must be commenced by the Commission not later than three months after the filing of such application . . ."). The Companies recognize that the Commission may separately proceed with public hearings in advance of the CPIRP hearing and has not proposed dates for such public hearings as part of this proposed schedule.

Companies elected to move forward at this time with the Motion in light of the compressed timelines contemplated by N.C.G.S. § 62-82(a). However, the Companies have also expressed an openness to continuing discussions with the parties regarding the proposed consolidated procedural schedule for the Dockets to determine if greater procedural consensus can be achieved.

IV. CONCLUSION

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully requests that the Commission grant their Motion and (1) consolidate the Dockets and (2) utilize the comprehensive procedural schedule provided as Exhibit A in setting the procedural schedule for the Marshall CPCN proceeding and the Roxboro CPCN proceeding (after the application is filed).

Respectfully submitted, this the 15th day of March, 2024.

/s/ Jack E. Jirak

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*Attorneys for Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC*

Comprehensive Schedule – NC CPIRP, DEP CC CPCN & DEC CT CPCN			
Date	Docket	Item	Notes
January 31, 2024	CPIRP	Supplemental Planning Analysis and supporting testimony filed with NCUC	
March 14, 2024	Marshall CTs CPCN	CPCN Application Filed	
March 28, 2024	Roxboro CC CPCN	Targeted filing date for CPCN Application	
May 23, 2024	Marshall CTs CPCN	Proposed Date Public Staff/Intervenor Direct Testimony Due	70 days from March 14 th CPCN Application
May 28, 2024	CPIRP	Public Staff/Intervenor Direct Testimony Due (and deadline for petitions to intervene)	
June 6, 2024	Roxboro CC CPCN	Proposed Date for Public Staff/Intervenor Direct Testimony	70 days from March 28 th CPCN application
June 12, 2024	Marshall CTs CPCN	Last day for Commission to commence a hearing on the Marshall CT CPCN application	Duke would agree not to contest delay of the Marshall CT hearing until the consolidated CPIRP / CPCN hearing.
June 17, 2024	CPIRP	Intervenor Technical Conference	
June 26, 2024	Roxboro CC CPCN	Last day for Commission to commence a hearing on the Roxboro CPCN application	Duke would agree not to contest delay of the Roxboro CC hearing until the consolidated CPIRP / CPCN hearing.
July 1, 2024	CPIRP	Duke’s Rebuttal Testimony Due	
July 2, 2024	Marshall CTs CPCN	Duke’s Rebuttal Testimony Due	40 days from May 23 rd Public Staff/Intervenor Testimony
July 16, 2024	Roxboro CC CPCN	Duke’s Rebuttal Testimony Due	40 days from June 6 th Public Staff/Intervenor Testimony
July 22, 2024	CPIRP / Marshall CTs CPCN / Roxboro CC CPCN	Beginning of expert witness hearing	CPIRP hearing commences first (estimated end date of July 30), followed by Marshall hearing (estimated end date of August 1)

Comprehensive Schedule – NC CPIRP, DEP CC CPCN & DEC CT CPCN			
Date	Docket	Item	Notes
			and then Roxboro hearing (estimated end date of August 5). Marshall CTs CPCN—138 days from March 14 th CPCN Application Roxboro CC CPCN—126 days from March 28 th CPCN Application
August 26, 2024	CPIRP	Proposed Orders and Briefs Due (<i>Estimated</i>)	15 Business Days after August 5 th estimated end date of consolidated CPIRP / CPCN Hearing
September 3, 2024	Marshall CTs CPCN	Proposed Orders and Briefs Due (<i>Estimated</i>)	30 days after August 1 st estimated end date of Marshall CTs CPCN hearing
September 4, 2024	Roxboro CC CPCN	Proposed Orders and Briefs Due (<i>Estimated</i>)	30 days after estimated August 5 th end date

CERTIFICATE OF SERVICE

I certify that copies of Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's *Motion to Consolidate*, filed today in Docket Nos. E-100, Sub 190, E-2, Sub 1318, and E-7, Sub 1297 have been served by electronic mail, hand delivery, or by depositing a copy in the United States mail, postage prepaid, properly addressed to parties of record.

This the 15th day of March, 2024.

/s/ E. Brett Breitschwerdt

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