McGuireWoods LLP 501 Fayetteville St. Suite 500 Raleigh, NC 27601 Phone: 919.755.6600 Fax: 919.755.6699 www.mcguirewoods.com

Mary Lynne Grigg
Direct: 919.755.6573

MCGUIREWOODS

mgrigg@mcguirewoods.com

April 9, 2020

VIA Electronic Filing

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

> Re: Docket No. E-2, Sub 1249 Docket No. E-7, Sub 1237 Docket No. E-22, Sub 585

> > PSNC Letter in Response to Commission Order

Dear Ms. Campbell:

Public Service Company of North Carolina, Inc. ("PSNC or the "Company") respectfully submits this letter in lieu of comments in response to the North Carolina Utilities Commission's ("Commission") April 2, 2020 *Order Joining Necessary Parties and Requesting Comments* ("Order") issued in the above-captioned dockets. Ordering Paragraph Four (4) of the Order directed that on or before April 9, 2020, parties may submit initial comments on the Petition of Carolina Utility Customers Association, Inc. ("CUCA") for Expedited Approval of Temporary Adjustments to Electricity Billing Demand Charges filed on March 31, 2020 ("Petition").

The concerns with the electric rate schedules that CUCA raises in its Petition are not applicable to PSNC's customers. PSNC's rate schedules do not have demand charges that would be set, and remain in effect afterwards, because of an increase in usage due to short-term increases in production. Similarly, customers who experience temporary decreases in production or plant closures, and hence reduced usage, would not see their bills affected by a previously established demand charge, as PSNC simply does not have a demand charge mechanism in its rates. Accordingly, PSNC submits this letter in lieu of comments to the Commission. However, PSNC respectfully reserves the right to submit reply comments in accordance with the Commission's Order on April 15, 2020, should the Company find it necessary to do so.

Ms. Kimberley A. Campbell, Chief Clerk April 9, 2020 Page 2

Should you have any questions, please do not hesitate to contact me. Thank you for your assistance in this matter.

Very truly yours,

/s/Mary Lynne Grigg

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing <u>Letter in Response to Commission Order</u>, filed in Docket Nos. E-2, Sub 1249; E-7, Sub 1237; and E-22, Sub 585, has been served this day upon all parties of record via U.S. mail, postage paid, hand delivery, or electronically.

This, the 9th day of April, 2020.

/s/Mary Lynne Grigg

McGuireWoods LLP 500 Fayetteville Street, Suite 500 PO Box 27507 (27611) Raleigh, North Carolina 27601 (919) 755-6573 (Direct) mgrigg@mcguirewoods.com

Attorney for Public Service Company of North Carolina, Inc.