



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

October 18, 2021

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket Nos. E-2, Sub 1159 and E-7, Sub 1156 - In the Matter of Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Competitive Procurement of Renewable Energy Program

Dear Ms. Dunston:

On October 13, 2021, the Commission issued an Order Requesting Comments on Petition (Order) in Docket Nos. E-2, Sub 1159 and E-7, Sub 1156, requesting comments from the parties regarding the Carolinas Clean Energy Business Association's (CCEBA) October 5, 2021 Petition to Initiate Resource Solicitation Cluster (RSC) for CPRE Tranche 3 (Petition). The Petition requests that the Commission order Duke and the CPRE Program Independent Administrator (IA) to conduct Tranche 3 via a Resource Solicitation Cluster (RSC) pursuant to North Carolina Interconnection Procedures (NCIP) Section 4.4.2. On October 8, 2021, Duke Energy Progress, LLC (DEP) and Duke Energy Carolinas, LLC (DEC, together, Duke) filed a letter in CPRE dockets regarding CCEBA's Petition. Duke states that the IA and Duke continue to engage with stakeholders on the timing and implementation of Tranche 3; however, Duke advises that it does not anticipate that aligning CPRE Tranche 3 with the Transitional Cluster Study (TCS) will be feasible.

The Public Staff provides this letter in lieu of comments in response to the Order. On October 14, 2021, the IA held a third stakeholder webinar to discuss the implementation of Tranche 3, in addition to two webinars hosted prior to the filing of the Petition. At this meeting, Duke (1) reiterated its position that it was no longer feasible to proceed with Tranche 3 as part of TCS due to timing constraints and the lack of consensus among the stakeholders; and (2) proposed a DEC-only RSC consistent with the CCEBA Petition.

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The Public Staff is encouraged by Duke's attempt to find common ground by proposing the RSC. The feedback from stakeholders during the webinar on the process and proposed timeline was positive overall, though the market participants seemed concerned that the RSC proposed would exclude bids in DEP. Duke stated that a DEP study process would necessarily be more complex due to the existing transmission constraints, and therefore, more difficult to implement within a timeframe before the start of the Definitive Interconnection System Impact Study (DISIS) Cluster 1. The Public Staff agrees that limiting the RSC to projects in the DEC territory will simplify the study process and allow Duke to meet the timelines necessary to implement a separate solicitation cluster.

Duke has shared a draft of the comments it intends to file today with the Public Staff. The draft comments request that the Commission stay the proceeding for 30 days to allow the parties to continue to engage with the IA in developing a path forward for the RSC. The Public Staff agrees with Duke and, therefore, requests that the Commission delay its consideration of the Petition to allow the parties to continue discussions and, hopefully, achieve consensus around the details of a RSC for Tranche 3.

Sincerely,

/s/ Layla Cummings
Staff Attorney
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cc: Parties of Record