

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, Sub 1167

DOCKET NO. E-7, Sub 1166

In the Matter of:)	
)	
Application of Duke Energy Progress, LLC,)	DUKE ENERGY PROGRESS,
and Duke Energy Carolinas, LLC Requesting)	LLC AND DUKE ENERGY
Approval of Solar Rebate Program Pursuant to)	CAROLINAS, LLC'S REPLY
N.C. Gen. Stat. § 62-155(f))	COMMENTS TO NCSEA'S
)	RESPONSE TO APPLICATION
)	TO REVISE SOLAR REBATE
)	PROGRAM

NOW COME Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC (collectively "Duke Energy" or "the Companies"), and respectfully submit reply comments in response to the comments filed on March 10, 2021, by the North Carolina Sustainable Energy Association ("NCSEA").

In its comments, NCSEA requests that the Commission reject Duke Energy's application despite the fact that NCSEA thinks the January 2021 rollout caused more issues for consumers than any prior rollout since the beginning of the program.¹ While acknowledging the current system is flawed, NCSEA states its concern with the application is that its member installers will not be able to train their staff adequately and that there may be an inability to educate the public about these changes in time for the July opening.² While the Companies appreciate NCSEA's willingness to implement a lottery or a random selection process in January 2022, if the Commission accepts the NCSEA's assertion that the January 2021 rollout caused more issues for consumers than any prior rollout, then the program should be changed as soon as possible. Duke Energy,

¹ See NCSEA's Response to Application, p 1.

² *Id.* at 2.

with the Public Staff's support, has provided critical changes necessary to solve many of the issues faced by consumers.

NCSEA states it is advising its member solar installer companies not to market distributed solar by mentioning the rebate program to potential customers. Presumably, this is an attempt to downplay the rebate program to reduce the demand, which has exceeded supply. However, this is not a sufficient solution to the immediate problems that vex the program. First, there are solar installers who are not members of the NCSEA and cannot be counted on to do the same. Secondly, and more importantly, this does nothing to fix any of the outstanding problems. If no changes are made to the program, the Companies expect the same outcome in July that occurred in January, which no one, including the NCSEA, wants.

As to whether solar installers and the public have adequate time to prepare for changes to the program in July, the Companies reiterate their commitment to accelerate training and notifications.³ The schedule for installer webinars will be included in the email communications sent to installers within a week, pending approval of the application, in order to allow installers to plan for the attendance of members of their teams. Also, it should be recognized that the application process is not being significantly changed. The rebate application will remain the same. Customers will still apply through the website portal. The time of the application period opening remains the same, but the opportune timeframe to submit an application is extended. The main changes are how the applications are selected, which applicants are eligible, and the time period to install after

³ See Application, pp 7-8. "Within one week, pending the Commission's approval of this application, the Companies are committed to have an instructional video available to customers explaining the changes and to send emails explaining the changes to all customers who have submitted an interconnection application for net metering. The Companies will also send emails to installers to notify them of the changes and are willing to accelerate the installer's webinar, too."

receiving a rebate reservation. The preliminary administrative changes are the responsibility of Duke Energy and not the NCSEA or its members. If a solar installer fails to communicate how the process is going to work, customers will still be in a better place under Duke Energy's proposal than under a first-come, first-served process because even if an eligible applicant misses the opportunity to apply in July, despite having a week to do so, all eligible customers will be permitted to apply at later openings.

As for the elimination of the 90-day rule and the October 6, 2020 retroactive installation deadline for eligibility, Duke Energy carefully considered approaches debated internally by NCSEA's installers and decided eliminating the 90-day rule and allowing installations installed after October 6, 2020 is the most equitable approach. The Public Staff agrees. Although NCSEA's members did not reach a consensus, some of their members also apparently agree with this approach.⁴ The Companies reiterate allowing customers who installed on or after October 6, 2020 to continue to apply is not an arbitrary cutoff. Customers who decided to install between October 6, 2020 and November 6, 2020 could not have been fully aware that capacity would be reduced by half in January 2021. Although Duke Energy proposed reducing the capacity in half earlier in 2020, the decision was not finalized until November 6, 2020. Additionally, any customer who installed prior to October 6, 2020 did so with the knowledge that they were already ineligible for the January 2021 opening. Therefore, those customers who installed prior to October 6, 2020 do not have the notion that a proverbial rug was pulled out from under them.

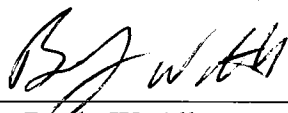
Finally, with regard to Commission's pending decision to reduce the rebate or adopt a tiered system, the Companies did not address those issues in its application

⁴ See NCSEA's Comments, p 3.

because the Companies' position has not changed, and those issues have already been addressed. However, if the Commission decides to reduce the rebate or create a tiered structure, those rebate values can be assigned under the random selection process and implemented along with the other proposed changes in the application.

For the reasons provide in these reply comments and in the March 3, 2020 Application, the Companies request that the Commission approve Duke Energy's application for the July 2021 rebate window as originally filed.

Respectfully submitted this 12th day of March, 2021.

By: 

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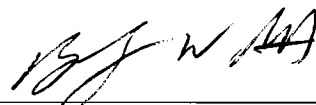
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ATTORNEYS FOR DUKE ENERGY PROGRESS,LLC.
AND DUKE ENERGY CAROLINAS, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC's **REPLY COMMENTS** have been served by electronic mail (e-mail) to parties of record.

This, the 12th day of March, 2021.



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