



June 30, 2022

Ms. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

Re: *Comments Regarding Comprehensive Compliance with NCIP Section 6.5 and Status Report Regarding Execution of Self-Inspection Agreements for Uninspected Facilities – Docket No. E-100, Sub 101*

Dear Ms. Dunston,

This letter is submitted in lieu of formal comments in the above docket. Intervenor Carolinas Clean Energy Business Association (“CCEBA”) appreciates the opportunity to have participated in the development of the self-inspection regime discussed in the Status Report filed by Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (collectively “Duke”) on May 26, 2022.

In reviewing the Status Report, CCEBA noted an error in the chart on page 5 of the Status Report which reports the number of “Uninspected Facilities” in each category of compliance with the inspections requirements of the Commission’s February 11, 2022 *Extension Order*. The chart states that 296 Uninspected Facilities returned a Pro Forma MOA and chose the “Duke-Approved Third Party Inspection Program Option” while only 2 chose the “Self-Administered Inspection Program Option.” However, Attachment C to the Status Report lists the opposite, with 296 Uninspected Facilities having chosen the “Self-Administered Inspection Program Option” and 2 having chosen the “Duke-Approved Third Party Inspection Program.” CCEBA confirmed with counsel to Duke that the chart contained an error.

CCEBA agrees with Duke that the negotiated self-inspection provisions of the Pro Forma MOA have been administered with dispatch and attention to detail. CCEBA appreciates Duke’s diligence and outreach once the program was underway. Nevertheless, is important for the Commission to have an accurate understanding of

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the results, as the vast majority of those facilities that responded, and indeed the vast majority of all extant facilities chose to self-administer their compliance program and undertake their own inspections.

In response to Duke's *Comments Regarding Comprehensive Compliance with NCIP Section 6.5*, CCEBA urges Duke to keep these results in mind, and to invite the industry, through CCEBA and other stakeholders, to participate from the beginning in the design of the anticipated "periodic inspections of other facilities" referenced in those Comments. CCEBA stands ready to assist in facilitating those discussions to ensure that the interests of all parties, including those of the consuming public, are protected.

Respectfully submitted,

/s/John D. Burns

John D. Burns

*General Counsel*

Carolinas Clean Energy Business Association

NC Bar No. 24152

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above *Letter in Lieu of Comments* as filed in Docket No. E-100, Sub 101, was served via electronic delivery or mailed, first class postage prepaid, upon all parties of record.

This the 30<sup>th</sup> day of June, 2022.

/s/John D. Burns  
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