Lawrence B. Somers
Deputy General Counsel

Mailing Address:
NCRH 20 / P.O. Box 1551
Raleigh, NC 27602

o: 919.546.6722
f: 919.546.2694

bo.somers@duke-energy.com

March 27, 2018

VIA ELECTRONIC FILING

M. Lynn Jarvis, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: The Federal Tax Cuts and Jobs Act – Duke Energy Progress, LLC's Supplemental Comments
Docket No. M-100, Sub 148**

Dear Ms. Jarvis:

Pursuant to the Commission's January 3, 2018 *Order Ruling that Certain Components of Certain Public Utility Rates are Provisional as of January 1, 2018, Initiating a Generic Proceeding, and Requesting Comments*, Duke Energy Progress, LLC ("DEP") respectfully requests that the Commission accept the enclosed Supplemental Comments for filing in connection with the referenced matter. These Supplemental Comments take into consideration the Commission's February 23, 2018 *Order Accepting Stipulation, Deciding Contested Issues and Granting Partial Rate Increase* in Docket No. E-2, Sub 1142, the reply comments filed by other parties in this docket, and the Commission's March 8, 2018 *Order Approving Compliance Filing and Change in Rates* in Docket No. E-2, Sub 1142, and offer more specific proposals on how DEP could implement the impacts of the Federal Tax Cuts and Jobs Act to benefit customers.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

Enclosure

cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. M-100, SUB 148

In the Matter of		
	)	
The Federal Tax Cuts and Jobs Act	)	**DUKE ENERGY PROGRESS' SUPPLEMENTAL COMMENTS**
	)	
	)	

Pursuant to North Carolina Utilities Commission's ("the Commission") January 3, 2018 *Order Ruling that Certain Components of Certain Public Utility Rates are Provisional as of January 1, 2018, Initiating a Generic Proceeding, and Requesting Comments*, Duke Energy Progress, LLC ("DEP" or the "Company")[1] hereby requests that the Commission accept the following Supplemental Comments. Specifically, these Supplemental Comments update DEP's estimated annual cost of service effect of the changes to the levels of income tax expenses expected due to the Federal Tax Cuts and Jobs Act (the "Tax Act") provided in the Company's Initial Comments in this docket. The update is based on the revenue requirement approved by the Commission in its March 8, 2018 *Order Approving Compliance Filing and Change* in Rates in Docket No. E-2, Sub 1142. These supplemental comments also outline DEP's more specific proposal as promised in DEP and DEC's March 1, 2018 Supplemental Comments in this docket. DEP continues to propose that the benefits of the Tax Act be addressed in the Company's

[1] On March 1, 2018, DEP and Duke Energy Carolinas, LLC ("DEC") filed joint Supplemental Comments in this docket, in which DEP proposed to make this supplemental filing to propose more specific recommendations after receipt of the Commission's approval of the compliance revenue requirement in Docket No. E-2, Sub 1142. The Commission's *Order Approving Compliance Filing and Change in Rates* was issued on March 8, 2018 in Docket No. E-2, Sub 1142.

next general rate case proceeding or through a decrement rider established by the Commission in this proceeding.

THE ESTIMATED COST OF SERVICE EFFECT OF THE TAX ACT – UPDATED FOR DEP RATE CASE ORDER

Please see attached DEP Updated Exhibit 2 for the estimated effect of the Tax Act on DEP's cost of service approved in Docket No. E-2, Sub 1142. The rates based on this cost of service study will become effective for service rendered on or after March 16, 2018. Updated Exhibit 2a shows a resulting reduction in the annual revenue requirement of $104 million for DEP.[2] This updated $104 million reduction is comprised of a $111 million decrease in base rates and a $7 million increase in the NC EDIT rider both related to the lower federal tax rate – from 35 to 21 percent. Updated Exhibit 2b shows how the revenue requirement reduction translates into a decrement rate. In its Initial Comments, DEP provided a decrement rate based on its 2013 rate case, and began applying that decrement to North Carolina retail sales beginning January 1, 2018, and deferring the resulting amount into a regulatory liability. DEP plans to update the decrement to the new rate shown in Updated Exhibit 2b of these Supplemental Comments and apply to North Carolina retail services provided beginning March 16, 2018. DEP would propose to continue this deferral until new rates can be established in its next general rate case proceeding. Should the Commission decide to order a rate change in this docket which incorporates this impact, DEP would stop the deferral when the new rates became effective.

[2] DEP's Initial Comments in this docket also estimated a $104 million revenue reduction based upon its 2013 rate case.

Finally, it should be noted that the attached exhibits only show the impact of the Tax Act on base rates and the NC EDIT rider. The Company expects there may be additional benefits for customers through other riders, which will be handled in the respective annual rider filings and experience modification factors.

DUKE ENERGY PROGRESS' PROPOSAL

While DEP continues to propose that the benefits of the Tax Act be addressed in the Company's next general rate case proceeding, should the Commission decide to reduce customers' rates in this docket instead, DEP submits the following proposal to benefit customers in the short term and long term.

1. **Incorporate a $104 million reduction in revenue requirements to reflect federal income taxes at a 21% rate, rather than a 35% rate.**

2. **Incorporate reductions totaling approximately $45 million in proposed revenue requirements to return excess accumulated deferred income taxes ("EDIT") to customers under the following proposals:**

Protected Federal EDIT related to Property, Plant and Equipment

Return excess deferred income taxes for which there are IRS requirements (protected deferred income taxes) based on the method required by IRS rules. Specific IRS rules apply to deferred income taxes related to property, plant and equipment for which there are differences in book vs. tax depreciation. These differences are related to the method of depreciation and depreciable life. The Company would propose to reduce its revenue requirements by approximately $37 million to return approximately 4.29% of the balance of excess deferred taxes to customers annually over the remaining life of the property, plant and equipment to which the deferred taxes are related. This proposal complies with IRS tax normalization rules. The revenue requirement reduction of $37 million is a net amount that incorporates both the decrease in operating expenses related to the tax rate change and the increase in rate base associated with the lesser amount of accumulated deferred income taxes that are deducted from rate base.

Unprotected Federal EDIT related to Property, Plant and Equipment

Return excess deferred income taxes related to property, plant and equipment, but *not* subject to IRS tax normalization rules over 20 years. This proposal would reduce the Company's revenue requirements by approximately $13 million per year. This proposal serves to refund the excess tax amounts over a period that considers the long lives of the property, plant and equipment to which these tax amounts relate. This period aligns with the timeframe that the benefits (i.e., deferred tax liability offset to rate base) would be received by customers absent the change in tax rate. The revenue requirement reduction of $13 million is a net amount that incorporates both the decrease in operating expenses related to the tax rate change and the increase in rate base associated with the lesser amount of accumulated deferred income taxes that are deducted from rate base. DEP's proposal helps to smooth out volatility in customer rates over the long term for the benefit of customers.

Unprotected Federal EDIT – Other

Using a rider, collect over five years the excess deferred taxes related to timing differences between book income and taxable income that are 1) not subject to IRS normalization rules and 2) are not related to property, plant and equipment. For DEP, the deferred income taxes and resulting excess deferred income taxes in this category are a net asset, instead of a net liability. As a result, the balance actually needs to be collected from customers as opposed to returned. The rider would incorporate an approximately $7 million increase in operating expense per year over the five-year period. The increased accumulated deferred income taxes that are deducted from rate base equate to an approximate $2 million reduction in revenue requirements and would be reflected in a base rate adjustment rather than the rider.

It should be noted that the EDIT balances in each category will continue to fluctuate and will not be final until the Company files its 2018 tax returns in late 2019. Therefore, adjustments and true-ups may need to be made in future rate cases.

3. **Incorporate an increase in proposed revenue requirements of $100 million to collect certain expenses on an accelerated basis. In doing so, the Company intends to minimize customer rate volatility, and minimize financing costs over the long term.**

The reduction in federal income tax rate has a dual effect on customer rates – a decrease in operating expense and an increase in rate base. This accelerated return of excess deferred income taxes to customers creates a rate reduction that is followed by a rate increase. The Company's proposal would smooth out this rate volatility. This approach does not ask customers to pay costs that are not appropriate costs of providing electric service, but rather adjusts the timing of payment of the costs in a manner that minimizes significant step changes in rates. The amount of accelerated expense recovery proposed by the Company is designed to achieve this objective.

The net effect of the proposed adjustments is a reduction of $56 million in base rates, netted with an annual revenue increase of $7 million through a five-year rider.

Both DEC and DEP have proposed that the Commission could mitigate these impacts by offsetting items such as storm response costs, ongoing coal ash basin closure compliance costs or other environmental compliance costs, or accelerating the depreciation of certain assets such as the existing AMR meters or coal plants.[3]

One option is to use this reduction in the federal income tax rate to offset the ongoing necessary investments in coal ash basin closure expense to comply with the EPA's Coal Combustion Residuals Rule ("CCR") and the North Carolina Coal Ash Management Act ("CAMA"). DEP would propose to record $100 million amortization expense per year to the same regulatory asset to which the ongoing compliance costs are recorded, thereby reducing customers' future obligation.

Another option would be to allow DEP to record $100 million per year for accelerated depreciation for AMR meters and/or certain coal-fired plants. Again, under this option, customers would benefit in the future through lower depreciation expense following the next depreciation study.

This proposed approach would reduce customer bills in the near term and help to offset rate increases in the future. Importantly, customers benefit if the Company can maintain its ability to access low-cost capital. This enables the Company to maintain its strong credit quality and any treatment of tax reform should support maintaining the Company's pre-Act credit quality. DEP's approach will balance the importance of delivering savings to customers and upholding the Company's financial strength, which ultimately benefits customers.

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[3] The accelerated depreciation would be accomplished by creating a North Carolina retail regulatory liability. That liability would then be used to reduce depreciation expense on the specific asset or group of assets the next time depreciation rates are updated, similar to the way that the DEP Harris Nuclear Plant accelerated depreciation was used to reduce depreciation expense in Docket No. E-2, Sub 1023.

CONCLUSION

For all the foregoing reasons, DEP respectfully requests that the Commission approve and adopt the recommendations contained in these Supplemental Comments to deliver savings to customers in a manner that balances the interests of customers and the Company.

Respectfully submitted, this the 27th day of March, 2018.

Lawrence B. Somers
Deputy General Counsel
Duke Energy Corporation
P. O. Box 1551, NCRH 20
Raleigh, North Carolina 27602
Telephone: 919-546-6722
bo.somers@duke-energy.com

Dwight W. Allen
The Allen Law Offices
1514 Glenwood Avenue, Suite 200
Raleigh, North Carolina 27608
Telephone: 919- 838-0529
dallen@theallenlawoffices.com

Counsel for Duke Energy Progress

Duke Energy **Updated Exhibit 2**
Docket No. M-100, Sub 148
DEP Supplemental Response to Commission Request for Comments
Estimated annual cost-of-service effect of the changes to the levels of income tax expenses due to the December 22, 2017 enactment of the Federal Tax Cuts and Jobs Act (the "Act")

Duke Energy Progress
(in Thousands)

North Carolina Retail Operations

Using Rate Case Adjusted Test Year Ending December 2016

Line No.	Item	Per E-2, Sub 1142, Approved Rates	Changes to the Levels of Income Tax Expenses Due to the Act	Cost of Service w/ Federal Changes
		(a)	(b)	(c) = (a) + (b)
1	**NET OPERATING INCOME FOR RETURN**			
2	Electric operating revenue	$3,343,502		$3,343,502
3	Electric operating expenses:			
4	Operating & maintenance	1,847,869		1,847,869
5	Depreciation & Amortization	568,240		568,240
6	Other Taxes	99,877		99,877
7	Income Taxes	242,712	(74,034)	168,678
	Due to Per Books plus Proforma Change		*(65,966)*	*(65,966)*
	Due to Revenue Increase		*(8,069)*	*(8,069)*
8	Investment Tax Credits	(2,093)		(2,093)
9	Total electric operating expenses	2,756,605	(74,034)	2,682,571
10	Return before interest on deposits	$586,897	$74,034	$660,931
11	Interest on customer deposits	(8,662)		(8,662)
12	Operating income	$578,235	$74,034	$652,269
13	**RATE BASE**			
14	Electric plant in service	$ 16,462,655		16,462,655
15	Accumulated depreciation and amortization	(7,601,372)		(7,601,372)
16	Net electric plant in service	8,861,283	-	8,861,283
17	Materials & supplies	632,680		632,680
18	Cash working capital	688,669		688,669
19	Accumulated deferred income taxes	(2,065,238)	110,142	(1,955,097)
20	Operating reserves	(66,990)		(66,990)
21	Construction work in progress	102,930		102,930
22	Total rate base	8,153,333	110,142	8,263,475

Notes
Column A - per DEP Compliance Exhibit 1, Page 1 (col. 6), Rate Base per Page 4 (col. 4) plus Page 1 (line 12 col. (5))

Column B - reflects the aggregate change in the Federal income tax rate from 35% to 21%, including adjustment to ADIT to reflect one year's worth of lower deferred income tax expense, consistent with prior adjustments in M-100 Sub 138. DEP did not have a manufacturing tax deduction in its test period in E-2 Sub 1142; therefore, no adjustment is included to reflect the elimination of this benefit. Also, this does not include any impacts from EDIT or from the elimination of bonus depreciation.

Derivation of Duke Energy Progress, Inc. Decrement - 2018
Federal Tax Cuts and Jobs Act Act

	Description	2018 Impact	Notes
	Income Tax Change		
1	Impact of Tax Rate Change - Income Tax Expense	$ (65,965,682)	*Company calculations based on Income Taxes included in Docket E-2 Sub 1142 excluding proposed revenue increases for common equity in docket E - 2 Sub 1142.*
2	2018 Income gross up factor[1]	76.252%	*Federal income tax rate at 21%, NC state income tax at 3%, GRT at 0%, all other factors held constant from the rate case*
3	Revenue Req't Impact - Income Tax Expense per books and pro forma adjustments	$ (86,510,113)	*Row 1 / Row 2*
4	Increase in Required Return - Equity portion	$ 121,535,896	*Per Compliance filing workpapers*
5	2018 Income gross up factor[1]	62.739%	*Federal income tax rate at 35%, NC state income tax at 3%, GRT at 0%, as applied in docket E-2 Sub 1142*
6	2018 Income gross up factor[1]	76.252%	*Federal income tax rate at 21%, NC state income tax at 3%, GRT at 0%, all other factors held constant from the rate case*
7	Revenue Req't Impact - Revenue Increase	$ (34,329,451)	*Row 4 / Row 6 - Row 4 / Row 5*
8	Impact of Tax Rate Change - Rate Base	$ 110,141,761	*Company calculations based deferred component of change in Line 1.*
9	2018 Rate base return & gross-up factor[1]	8.702%	*Federal income tax rate ar 21%, NC state income tax at 3%, GRT at 0%, all other factors held constant from the rate case*
10	Revenue Req't Impact - Rate Base	$ 9,584,018	*Row 8 x Row 9*
11	Levelized rider NC EDIT credit	$ (42,577,000)	*Rider per Compliance Exhibit 1 in Docket E-2 Sub 1142*
12	Levelized rider NC EDIT credit after tax	$ (26,838,000)	*Rider recalculated at 21% federal tax rate in EDIT and levelization calculation, all other factors held constant from the rate case.*
13	2018 Income gross up factor[1]	76.252%	*Federal income tax rate at 21%, NC state income tax at 3%, GRT at 0%, all other factors held constant from the rate case*
14	Updated Levelized rider NC EDIT credit	$ (35,196,458)	*Row 12 / Row 13*
15	Revenue Req't Impact - NC EDIT rider	$ 7,380,542	*Row 14 - Row 11*
16	Total Revenue Req't Impact	$ (103,875,004)	*Row 3 + Row 7 + Row 10 + Row 15*

NOTE:

[1] Annual Revenue includes NC Regulatory Fee and uncollectibles impact

Updated Exhibit 2b

Derivation of Duke Energy Progress, Inc. Decrement - 2018
Federal Tax Cuts and Jobs Act

	Description	Amount		Source
1	Annual Revenue Impact Due to Reduction in FIT[1]	($103,875,004)		Annual Revenue Impact per Updated Exhibit No. 2a
2	NC Retail Billed Sales	37,312,555,626	kWh	NC retail kwhrs adjusted for weather and customer growth in DEP compliance filing in docket E-2 Sub 1142
3	Rate for Deferral *Effective for service rendered on and after 3/16/2018*	($0.00278)	per kWh	(1) / (2)

NOTE:

[1] Annual Revenue includes NC Regulatory Fee and uncollectibles impact

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Progress, LLC's Supplemental Comments, in Docket No. M-100, Sub 148, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties:

David Drooz, Chief Counsel
LeeAnn Ackerman
Public Staff
North Carolina Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699-4300
david.drooz@psncuc.nc.gov
cl.ackerman@psncuc.nc.gov

Ralph McDonald
Warren Hicks
Bailey & Dixon, LLP
Counsel for CIGFUR
PO Box 1351
Raleigh, NC 27602-1351
rmcdonald@bdixon.com
whicks@bdixon.com

Margaret Force, Asst. Atty. General
NC Department of Justice
P O Box 629
Raleigh, NC 27602-0629
pforce@ncdoj.gov

Peter H. Ledford
NC Sustainable Energy Association
4800 Six Forks Road, Suite 300
Raleigh, NC 27609
peter@energync.org

Sharon Miller
Carolina Utility Customers Assoc.
1708 Trawick Road, Suite 210
Raleigh, NC 27604
smiller@cucainc.org

Robert Page
Counsel for CUCA
Crisp, Page & Currin, LLP
4010 Barrett Drive, Ste. 205
Raleigh, NC 27609-6622
rpage@cpclaw.com

John Runkle, Attorney
Counsel for NC WARN
2121 Damascus Church Rd.
Chapel Hill, NC 27516
jrunkle@pricecreek.com

Alan R. Jenkins
Jenkins At Law, LLC
2950 Yellowtail Ave.
Marathon, FL 33050
aj@jenkinsatlaw.com

Michael Colo
Counsel for ASU
Poyner Spruill LLP
P.O. Box 353
Rocky Mount, NC 27802
mscolo@poynerspruill.com

Matthew Quinn
Law Offices of F. Bryan Brice, Jr.
127 W. Hargett St., Ste. 600
Raleigh, NC 27602
matt@attybryanbrice.com

Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 E. Seventh St., Suite 1510
Cincinnati, OH 45202
kboemn@BKLlawfirm.com
jkyler@BKLlawfirm.com

Gray Styers, Jr.
Smith Moore Leatherwood LLP
434 Fayetteville St., Suite 2800
Raleigh, NC 27601
gray.styers@smithmoorelaw.com

Nadia Luhr
David Neal
Gudrun Thompson
Southern Environmental Law Center
601 W. Rosemary Street, Suite 220
Chapel Hill, NC 27516
nluhr@selcnc.org
dneal@selcnc.org
gthompson@selcnc.org

Sherri Zann Rosenthal
City of Durham
101 City Hall Plaza
Durham, NC 27701
sherrizann.rosenthal@durhamnc.gov

James P. West
Steve Blanchard
Fayetteville PWC
508 Person Street
Fayetteville, NC 28302
Jamie.west@faypwc.com
Steve.blanchard@faypwc.com

Jo Anne Sanford
Sanford Law Office
PO Box 28085
Raleigh, NC 27611
sanford@sanfordlawoffice.com

K. Ogden
Greenpeace
306 Parham Street, Ste. 200-C
Raleigh, NC 27601
kogden@greenpeace.org

Horace Payne
Karen Bell
Mark Webb
William Baxter
Dominion North Carolina Power
PO Box 26532
Richmond, VA 23261
horace.p.payne@dom.com
karen.bell@dom.com
mark.webb@dom.com
william.h.baxter@dom.com

Patricia S. Cowan-Coughlan
Utility Management Svcs Inc.
6317 Oleander Dr.
Wilmington, NC 28403
pcoughlan@utilmanagement.com

James C. Meade
Barnardsville Telephone Co.
1400 River Street
Wilkesboro, NC 28697
jim.meade@tdstelecom.com

Shaun C. Mohler
Brickfield, Burchette, Ritts & Stone
1025 Thomas Jefferson St.
Washington, DC 20007
scm@bbrslaw.com

James Jeffries
Moore & Van Allen
100 N. Tryon St.
Charlotte, NC 28202
jimjeffries@mvalaw.com

Fenton Erwin, Jr.
Erwin, Bishop, Capitano & Moss PA
4521 Sharon Rd., Ste. 350
Charlotte, NC 28211
ferwin@ebcmlaw.com

Benjamin Smith
NCSEA
4800 Six Forks Rd
Raleigh, NC 27609
ben@energync.org

Robert W. Kaylor
Law Office of Robert W. Kaylor
353 Six Forks Road, Ste. 260
Raleigh, NC 27609
bkaylor@rwkaylorlaw.com

Brett Breitschwerdt
Monica Webb
K M Dahl
Joseph Reid
Mary Lynn Grigg
Elaine Ryan
McGuire Woods, LLP
434 Fayetteville Street, Suite 2600
Raleigh, NC 27601
bbreitschwerdt@mcguirewoods.com
mwebb@mcguirewoods.com
kdahl@mcguirewoods.com
jreid@mcguirewoods.com
mgrigg@mcguirewoods.com
eryan@mcguirewoods.com

Sarah Collins
NC League of Municipalities
215 N. Dawson St.
Raleigh, NC 27603
scollins@nclm.org

Damon E. Xenopoulos
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., NW
8th Floor, West Tower
Washington, DC 20007
dex@smxblaw.com

Mark Hamlet
Hamlet & Associates PLLC
2601 Irongate Drive
Wilmington, NC 28412
mhamlet@hamletandassociates.com

Matthew Dosch
Citizens Telephone Company
PO Box 470
Rock Hill, SC 29730
matt.dosch@comporium.com

Paul Raaf
Office of the Forscom SJA
4700 Knox Street
Fort Bragg, NC 28310
paul.a.raa.civ@mail.mil

Thomas J. Roberts
Aqua NC Inc.
202 MacKenan Ct.
Cary, NC 27511
tjroberts@aquaamerica.com

Dan Bennett
Ellerbe Telephone Co.
PO Box 220
Ellerbe, NC 28338
dbennett@ellerbetelephone.net

Christopher J. Blake
Phillip Harris
Joseph Eason
Nelson Mullins Riley & Scarborough, LLP
4140 Park Lane Avenue, Suite 200
Raleigh, NC 27622
chris.blake@nelsonmullins.com
phillip.harris@nelsonmullins.com
joe.eason@nelsonmullins.com

Paula Chappell
NCDENR-Public Water Supply
1634 Mail Svcs. Center
Raleigh, NC 27699
Paula.chappell@ncdenr.gov

Texican Horizon Energy Marketing
7301 Carmel Exec. Park, Ste. 316
Charlotte, NC 28226

Daniel Higgins
Burns Day & Presnell PA
PO Box 10867
Raleigh, NC 27605
dhiggins@bdppa.com

Debra Benoy
NCDENR-Fayetteville Regional Office
225 Green St., Ste. 714
Fayetteville, NC 28301
Debra.benoy@ncdenr.gov

Jennifer Morgan
Williams Mullen
301 Fayetteville St.
Raleigh, NC 27601
jmorgan@williamsmullen.com

Gregory Locke
Electricities of NC
1425 Meadow Wood Blvd.
Raleigh, NC 27604
glocke@electricities.org

Matthew Klein
Carolina Water Svcs. Inc. of NC
5701 Westpark Dr.
Charlotte, NC 28217
mklein@uiwater.com

Kyle Smith
US Army Legal Svcs Agency
9275 Gunston Rd
Ft. Belvoir, VA 22060
kyle.j.smith124.civ@mail.mil

Excetral Caldwell
Cardinal Pipeline Co.
2800 Post Oak Blvd.
Houston, TX 77251
Excetral.caldwell@williams.com

Gary Creech
Pineville Telephone Co.
PO Box 249
Pineville, NC 28134
gcreech@pinevilledsl.net

Rai Trippe
Municipal Gas Auth. Of GA
PO Box 579
Toccoa, GA 30577
rtrippe@gasauthority.com

Corey Basinger
NCDENR-Sewer-Winston Salem
585 Waughtown St.
Winston-Salem, NC 27107
corey.basinger@ncdenr.gov

Stephanie Kueffner
Michelle Harding
Xoom Energy
11208 Statesville Rd
Huntersville, NC 28078
skueffner@xoomenergy.com
mharding@xoomenergy.com

Candy Paton
B. Craig Collins
PSCNC/SCANA
800 Gaston Rd
Gastonia, NC 28053
cpaton@scana.com
bcollins@scana.com

Fred Steele
Frontier Natural Gas Co.
110 P G W Drive
Elkin, NC 28621
fsteele@egas.net

Stan Coleman
2165 Belle Vernon Ave
Charlotte, NC 28210
scoleman41@carolina.rr.com

Pia Powers
Piedmont
PO Box 33068
Charlotte, NC 28233
pia.powers@piedmontng.com

Kiran Mehta
Troutman Sanders
301 S. College St.
Charlotte, NC 28202
kiran.mehta@troutmansanders.com

This the 27th day of March, 2018.

Lawrence B. Somers
Deputy General Counsel
Duke Energy Corporation
P.O. Box 1551/NCRH 20
Raleigh, North Carolina 27602
(919) 546-6722
bo.somers@duke-energy.com