

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-7, SUB 1304

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Application of Duke Energy Carolinas, LLC	)	<b>DIRECT TESTIMONY OF</b>
Pursuant to G.S. 62-133.2 and NCUC Rule	)	<b>JOHN D. SWEZ</b>
R8-55 Relating to Fuel and Fuel-Related	)	<b>DUKE ENERGY CAROLINAS, LLC</b>
Charge Adjustments for Electric Utilities	)	

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1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is John D. Swez, and my business address is 525 S. Tryon St  
3 Charlotte, North Carolina 28202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed as Managing Director, Trading and Dispatch, by Duke Energy  
6 Carolinas, LLC (“Duke Energy Carolinas,” “DEC,” or the “Company”). In that  
7 capacity, I lead the organization responsible for Power Trading on behalf of Duke  
8 Energy’s regulated utilities including DEC and Duke Energy Progress, LLC  
9 (“DEP”) (collectively, the “Companies”), as well as generation dispatch on  
10 behalf of Duke Energy’s regulated utilities in Indiana, Ohio, and Kentucky.

11 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL**  
12 **EXPERIENCE.**

13 A. I received a Bachelor of Science degree in Mechanical Engineering from  
14 Purdue University in 1992. I received a Master of Business Administration  
15 degree from the University of Indianapolis in 1995. I joined PSI Energy, Inc. in  
16 1992 and have held various engineering positions with the Company or its  
17 affiliates in the generation dispatch or power trading departments. In 2003, I  
18 assumed the position of Manager, Real-Time Operations. On January 1, 2006, I  
19 became the Director of Generation Dispatch and Operations with responsibility  
20 for (i) generation dispatch; (ii) unit commitment; (iii) 24-hour real-time  
21 operations; and (iv) plant communications related to short-term generation  
22 maintenance planning for Duke Energy’s regulated utilities in Indiana, Ohio, and  
23 Kentucky. During the period 2010-2017, I also managed the DEC Generation  
24 Dispatch function. I assumed my current role on November 1, 2019. Finally, I am

1 a registered Professional Engineer licensed in the States of North Carolina and  
2 Indiana.

3 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**  
4 **PROCEEDING?**

5 A. Yes. I testified before this Commission in support of DEC's 2022 fuel and fuel-  
6 related cost recovery application in Docket No. E-7, Sub 1282, and in DEP's 2022  
7 and 2020 fuel and fuel-related cost recovery application in Docket No. E-2, Sub  
8 1321 and Docket No. E-2, Sub 1272, respectively.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
10 **PROCEEDING?**

11 A. The purpose of my testimony is to describe DEC's fossil fuel purchasing practices,  
12 provide actual fossil fuel costs for the period January 1, 2023 through December  
13 31, 2023 ("test period") versus the period January 1, 2022 through December 31,  
14 2022 ("prior test period"), and describe changes projected for the billing period of  
15 September 1, 2024 through August 31, 2025 ("billing period").

16 **Q. YOUR TESTIMONY INCLUDES THREE EXHIBITS. WERE THESE**  
17 **EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND**  
18 **UNDER YOUR SUPERVISION?**

19 A. Yes. These exhibits were prepared at my direction and under my supervision, and  
20 consist of Swez Exhibit 1, which summarizes the Company's Fossil Fuel  
21 Procurement Practices, Swez Exhibit 2, which summarizes total monthly natural  
22 gas purchases and monthly contract and spot coal purchases for the test period and  
23 prior test period, and Swez Confidential Exhibit 3, which summarizes the annual  
24 fuels related transactional activity between DEC and Piedmont Natural Gas

1 Company, Inc. (“Piedmont”) for spot commodity transactions during the test  
2 period, as required by the Merger Agreement between Duke Energy and  
3 Piedmont.

4 **Q. PLEASE PROVIDE A SUMMARY OF DEC’S FOSSIL FUEL**  
5 **PROCUREMENT PRACTICES.**

6 A. A summary of DEC’s fossil fuel procurement practices is set out in Swez Exhibit  
7 1.

8 **Q. PLEASE DESCRIBE THE COMPANY’S APPROACH TO UNIT**  
9 **COMMITMENT AND DISPATCH OF ITS GENERATION ASSETS TO**  
10 **SERVE ITS CUSTOMERS ECONOMICALLY AND RELIABLY.**

11 A. Both DEC and DEP perform the same detailed daily process to determine the unit  
12 commitment plan that economically and reliably meets the Company’s projected  
13 system needs over the next seven days. The Company utilizes a production cost  
14 model to determine an optimal unit commitment plan to meet system requirements  
15 economically and reliably. The model minimizes the production costs needed to  
16 serve the projected customer demand within reliability and other system  
17 constraints over the 7-day forecast period. Inputs to the model include, but are not  
18 limited to, the following: (1) forecasted customer energy demand; (2) the latest  
19 forecasted fuel prices, reflective of market supply chain dynamics; (3) variable  
20 transportation rates; (4) planned maintenance and refueling outages at the  
21 generating units; (5) generating unit performance parameters; (6) reliability  
22 constraints such as units run to maintain day-ahead planning reserves or units  
23 required to run for transmission or voltage support; (7) expected market conditions  
24 associated with power purchases and off-system sales opportunities; and (8)

1 projected variable renewable resource contributions (i.e. solar). The production  
2 cost model produces the optimized hourly unit commitment plan for the 7-day  
3 forecast period. This unit commitment plan also provides the starting point for  
4 dispatch, but dispatch is then also subject to real time adjustments due to changing  
5 system conditions, including management of natural gas transportation  
6 constraints. The unit commitment plan is prepared daily and adjusted, as needed,  
7 throughout any given day to respond to changing real time system conditions.

8 **Q. DID THE COMPANY COMPLETE THE TRANSITION TO DYNAMIC**  
9 **DISPATCH DISCUSSED IN LAST YEAR'S PROCEEDING?**

10 A. Yes. The Company implemented this optimized coal input price process effective  
11 May 15, 2023.

12 **Q. PLEASE DISCUSS ANY IMPACTS TO THE COMPANY'S ECONOMIC**  
13 **UNIT COMMITMENT AND DISPATCH METHODOLOGY?**

14 A. The unit commitment and dispatch process described above did not change. The  
15 enhanced dynamic dispatch process is providing the economic unit commitment  
16 and dispatch production cost model with an optimized spot coal price input to use  
17 if needed to maintain projected inventories within limits at impacted coal plants.  
18 The use of this optimized spot coal price input maintains least cost economics by  
19 calculating incremental adjustments needed over a longer time horizon to maintain  
20 plant inventories within safety and reliability limits, while minimizing fuel  
21 security risk and total long term system costs for customers. The dynamic dispatch  
22 process also proactively reduces the need for more reactive approaches such as  
23 uneconomic unit commitment and dispatch and contractual buyouts.

24

1     **Q.     PLEASE DESCRIBE THE COMPANY’S DELIVERED COST OF COAL**  
2     **AND NATURAL GAS DURING THE TEST PERIOD.**

3     A.     The Company’s average delivered cost of coal per ton for the test period was  
4     \$126.23 per ton, compared to \$99.86 per ton in the prior test period, representing  
5     an increase of approximately 26%. The cost of delivered coal includes an average  
6     transportation cost of \$40.82 per ton in the test period, compared to \$33.65 per ton  
7     in the prior test period, representing an increase of approximately 21%. The  
8     increase in actual delivered costs is primarily due to the historically high coal  
9     commodity costs experienced in 2021 and 2022. The Company’s average price of  
10    gas purchased for the test period was \$ 4.94 per Million British Thermal Units  
11    (“MMBtu”), compared to \$6.94 per MMBtu in the prior test period, representing  
12    a decrease of approximately 29%. The cost of gas is inclusive of gas supply,  
13    transportation, storage and financial hedging.

14             DEC’s coal burn for the test period was 3.6 million tons, compared to a  
15    coal burn of 3.2 million tons in the prior test period, representing an increase of  
16    14%. The Company’s natural gas burn for the test period was 225.8 million MBtu,  
17    compared to a gas burn of 253.5 million MBtu in the prior test period, representing  
18    a decrease of approximately 11%.

19             Changes in coal and natural gas burns were primarily driven by the  
20    relationship of coal commodity prices during 2023 relative to natural gas prices in  
21    the same period, as rapidly declining coal commodity prices used for the dispatch  
22    and commitment of the Company’s units achieved parity with natural gas costs,  
23    increasing gas to coal generation switching at the Company’s dual fuel operating  
24    (“DFO”) stations. DFO stations can switch between burning coal or natural gas

1 daily, allowing continuous optimization between the two commodities. The large,  
2 combined size of the DFO units at approximately 5,700 MW and the  
3 competitiveness between coal and natural gas prices creates not only the  
4 opportunity to optimize commodities but also significant variations in the amount  
5 of coal or natural gas burned.

6 **Q. PLEASE DESCRIBE THE LATEST TRENDS IN COAL AND NATURAL**  
7 **GAS MARKET CONDITIONS.**

8 A. Coal markets continue to experience a high degree of market volatility due to a  
9 number of factors, including: (1) the inability of coal suppliers to respond timely  
10 to changes in demand; (2) natural gas price volatility; (3) increased uncertainty  
11 regarding proposed and imposed U.S. Environmental Protection Agency  
12 (“EPA”) regulations for power plants; (4) global demand for both steam and  
13 metallurgical coal; (5) tightened access to investor financing; (6) continued shifts  
14 in production between thermal and metallurgical coal as producers move away  
15 from supplying declining electric generation to take advantage of industrial  
16 demand; and (7) continued labor and resource constraints further limiting  
17 suppliers’ operational flexibility. Over the course of 2023, published coal  
18 market curves declined from the historically high levels in 2022 in response to  
19 low natural gas prices and overall lack of coal generation demand. Despite  
20 softening coal prices, coal producers continue to see the impacts of higher costs  
21 associated with mining operations such as labor and equipment costs putting  
22 additional pressure on their ability to compete with natural gas and renewables.  
23 This is a trend the Company is watching closely for potential impacts to long  
24 term supplier viability.

1 Long-term declines in demand for coal in the utility sector has also  
2 driven rail transportation providers to modify their business models to be less  
3 dependent on coal related transportation revenues. Although rail transportation  
4 providers are required to provide rail service, the Company's rail transportation  
5 providers have limited resources to adapt to significant changes in scheduling  
6 demand resulting from the Company's burn volatility, specifically in higher than  
7 forecasted coal burn scenarios. In 2023, the Company saw improvement in  
8 deliveries by its rail transportation providers following the delivery constraints  
9 experienced in 2022.

10 With respect to natural gas, the nation's natural gas supply has grown  
11 significantly over the last several years as producers enhanced production  
12 techniques, enhanced efficiencies, and lowered production costs. Natural gas  
13 prices are reflective of the dynamics between supply and demand factors, in 2023,  
14 market dynamics were primarily influenced by increasing production, and  
15 growing storage inventory balances which caused natural gas prices to sharply  
16 decline.

17 There remains a growing need for natural gas pipeline infrastructure, as  
18 gas production—particularly in low-cost regions such as Appalachia—is  
19 constrained as pipeline infrastructure permitting and regulatory process approval  
20 efforts are increasingly challenged, delaying planned pipeline construction and  
21 commissioning timing.

22 Over the longer-term planning horizon, natural gas supply has the ability  
23 to respond to changing demand while the pipeline infrastructure needed to move  
24 the growing supply to meet demand related to power generation, liquefied natural

1 gas exports and pipeline exports to Mexico is highly uncertain.

2 **Q. WHAT ARE THE PROJECTED COAL AND NATURAL GAS**  
3 **CONSUMPTIONS AND COSTS FOR THE BILLING PERIOD?**

4 A. Based on the most recently completed forecast for use in this filing, which used  
5 market prices as of December 12, 2023, DEC's coal burn projection for the billing  
6 period is 4.5 million tons, compared to 3.6 million tons consumed during the test  
7 period. DEC's billing period projections for coal generation may be impacted due  
8 to changes from, but not limited to, the following factors: (1) delivered natural gas  
9 prices versus the average dispatch cost of coal; (2) volatile power prices; and (3)  
10 electric demand. Combining coal and transportation costs, DEC projects average  
11 delivered coal costs of approximately \$110.64 per ton for the billing period  
12 compared to \$126.23 per ton in the test period. Declining coal commodity costs  
13 due to decreasing domestic demand is the primary driver for the decrease in  
14 delivered costs. This includes an average projected total transportation cost of  
15 \$37.46 per ton for the billing period, compared to \$40.82 per ton in the test period.  
16 This projected delivered cost, however, is subject to change based on, but not  
17 limited to, the following factors: (1) exposure to market prices and their impact on  
18 open coal positions; (2) the amount of Central Appalachian coal DEC is able to  
19 purchase and deliver and the non-Central Appalachian coal DEC is able to  
20 consume; (3) changes in transportation rates; (4) performance of contract  
21 deliveries by suppliers and railroads which may not occur despite DEC's strong  
22 contract compliance monitoring process; and (5) potential additional costs  
23 associated with suppliers' compliance with legal and statutory changes, the effects  
24 of which can be passed on through coal contracts.

1           DEC's current natural gas burn projection for the billing period is  
2           approximately 205.2 million MBtu, which is a decrease from the 225.8 million  
3           MBtu consumed during the test period. The current average forward Henry Hub  
4           price for the billing period is \$3.10 per MMBtu, compared to \$2.74 per MMBtu  
5           in the test period. Projected natural gas burn volumes will vary on factors such as,  
6           but not limited to, changes in actual delivered fuel costs and weather driven  
7           demand.

8           **Q.    HAVE THERE BEEN ANY CHANGES TO THE COMPANY'S**  
9           **MODELING PROCESS RELATED TO FORECASTING FUEL COSTS?**

10          A.    Yes, starting in 2023 the Fleet Analytics Stochastic Tool "FAST" model outputs  
11          are being used as part of the process to forecast future fuel costs. Since late 2020,  
12          the Company has used the outputs from the FAST model as the basis for its fuel  
13          procurement planning process.

14          **Q.    PLEASE PROVIDE AN OVERVIEW OF STOCHASTIC MODELING**  
15          **CAPABILITIES.**

16          A.    The stochastic model uses historic weather information to simulate numerous  
17          scenarios of future weather and commodity prices. For each of these scenarios,  
18          system load and commodity prices (gas, coal, oil and power) are all calculated in  
19          a correlated manner using historical correlations with each other and with weather.  
20          The resulting forecasts of this stochastic model give the Company not only  
21          expected fuel burns, but also the range of fuel burns and the probability associated  
22          with each range.

23          **Q.    WHAT STEPS IS DEC TAKING TO ENSURE A COST-EFFECTIVE**  
24          **RELIABLE FUEL SUPPLY?**

1 A. The Company continues to maintain a comprehensive coal and natural gas  
2 procurement strategy that has proven successful over the years in limiting average  
3 annual fuel price changes while actively managing the dynamic demands of its  
4 fossil fuel generation fleet in a reliable and cost-effective manner. With respect to  
5 coal procurement, the Company's procurement strategy includes: (1) having an  
6 appropriate mix of term contract and spot purchases for coal; (2) staggering coal  
7 contract expirations in order to limit exposure to forward market price changes;  
8 and (3) diversifying coal sourcing as economics warrant, as well as working with  
9 coal suppliers to incorporate additional flexibility into their supply contracts. The  
10 Company conducts spot market solicitations throughout the year to supplement  
11 term contract purchases, taking into account changes in projected coal burns and  
12 existing coal inventory levels. Additionally, the Company negotiates coal  
13 transportation contracts that support secure, reliable deliveries. As of July 1, 2022,  
14 the Company has implemented the Fuels and Related Equipment and Services  
15 Management and Supply Agreement (the "DECFM Agreement") between DEC  
16 and DEP, meaning DEC is the commercial face to the market for coal, reagents,  
17 and related transportation in the Carolinas. This agreement provides for an  
18 increasingly flexible fuel procurement strategy along with increased real-time  
19 logistical flexibility resulting in increased operational and cost efficiencies for  
20 customers.<sup>1</sup>

21 The Company has implemented natural gas procurement practices that  
22 include periodic Request for Proposals and shorter-term market engagement

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<sup>1</sup> North Carolinas Utilities Commission Docket No. E-7, Sub 1258 & Docket No. E-2, Sub 1282 Order Accepting Affiliate Agreement issued January 24, 2022.

1 activities to procure and actively manage a reliable, flexible, diverse, and  
2 competitively priced natural gas supply. These procurement practices include  
3 contracting for volumetric optionality in order to provide flexibility in responding  
4 to changes in forecasted fuel consumption. DEC continues to maintain a short-  
5 term financial natural gas hedging plan to manage fuel cost risk for customers via  
6 a disciplined, structured execution approach. DEC monitors and makes  
7 adjustments as necessary to its natural gas hedging program to ensure it remains  
8 appropriate based on market conditions and the Company's fuel procurement  
9 strategy.

10 Lastly, DEC procures long-term firm interstate and intrastate  
11 transportation to provide natural gas to their generating facilities. Given the  
12 Company's limited amount of contracted firm interstate transportation, the  
13 Company purchases shorter term firm interstate pipeline capacity as available  
14 from the capacity release market. The Company's firm transportation ("FT")  
15 provides the underlying framework for the Company to manage the natural gas  
16 supply needed for reliable cost-effective generation. First, it allows the Company  
17 access to lower cost natural gas supply from Transco Zone 3 and Zone 4 and the  
18 ability to transport gas to Zone 5 for delivery to the Carolinas' generation fleet.  
19 Second, the Company's FT allows it to manage intraday supply adjustments on  
20 the pipeline through injections or withdrawals of natural gas supply from storage,  
21 including on weekends and holidays when the gas markets are closed. Third, it  
22 allows the Company to mitigate imbalance penalties associated with Transco  
23 pipeline restrictions, which can be significant. The Company's customers receive  
24 the benefit of each of these aspects of the Company's FT: access to lower cost gas

1 supply, intraday supply adjustments at minimal cost, and mitigation of punitive  
2 pipeline imbalance penalties.

3 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

4 **A.** Yes, it does.