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December 7, 2015

VIA ELECTRONIC FILING

Gail L. Mount, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Carolinas, LLC's Supplemental Comments on
Advanced Metering Infrastructure Customer Opt-Out Requests
Docket No. E-100, Sub 141**

Dear Ms. Mount:

Pursuant to the Commission's November 5, 2015 *Order Approving Smart Grid Technology Plans, Declining to Schedule a Hearing, and Requesting Comments on Rule Revisions*, I am providing Duke Energy Carolinas, LLC's Supplemental Comments on Advanced Metering Infrastructure Customer Opt-Out Requests in connection with the referenced matter.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Lawrence B. Somers', written over a horizontal line.

Lawrence B. Somers

c: Parties of Record

OFFICIAL COPY

Dec 07 2015

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 141

In the Matter of)	
)	
Smart Grid Technology Plans Pursuant to)	SUPPLEMENTAL COMMENTS OF
Commission Rule R8-60.1(c))	DUKE ENERGY CAROLINAS, LLC
)	ON ADVANCED METERING
)	INFRASTRUCTURE CUSTOMER
)	OPT-OUT REQUESTS

Pursuant to the North Carolina Utilities Commission's ("the Commission") November 5, 2015 *Order Approving Smart Grid Technology Plans, Declining to Schedule a Hearing, and Requesting Comments on Rule Revisions* ("November 5, 2015 Order"), Duke Energy Carolinas, LLC ("DEC" or the "Company") respectfully requests that the Commission accept these Supplemental Comments as additional information intended to further explain DEC's December 1, 2015 Comments regarding its rationale and plans for allowing customers to opt-out of advanced metering infrastructure ("AMI") meter deployments in North Carolina.

DEC's current AMI by-pass policy is based upon customer concerns and DEC's current ability to reasonably accommodate the 0.06% of customers who have elected to opt-out of an AMI meter installation to date. Through customer interactions during the AMI projects, a small number of DEC customers have objected to installation of an AMI meter due to privacy concerns, cybersecurity concerns, and a primary concern with potential health effects from the radio frequencies ("RF") transmitted from AMI meters. There have also been a very small number of customers that have requested to have their existing AMR (drive-by) meter removed due to the same alleged RF health concerns.

DEC is vigilant in its efforts to protect the privacy and security of customer information today, and that has not changed with the transition to AMI. Additionally, the AMR meters currently installed, and the AMI meters being installed, all comply with the FCC requirements¹ for RF emissions. Based on this compliance, DEC does not share the RF concerns expressed by some customers; however, the Company is attempting to accommodate these customers by offering a non-communicating meter option that addresses their concerns.

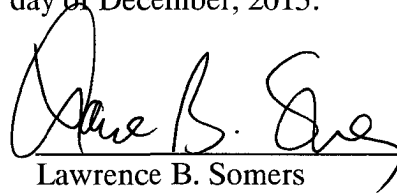
The Company is currently able to by-pass customers, or revert to the AMR (drive-by) option when customers object to an AMI meter, because AMI deployments to date are spread out over the entire service area. Therefore, many of the drive-by meter reading routes are still in place or have only been minimally modified, so there is minimal impact to current operations, and it does not currently create significant incremental costs. Once the Company has installed AMI meters with enough saturation where drive-by meter reading routes for an area are reduced or eliminated, however, there will be incremental costs to track, manage and read AMI opt-out customers.

As submitted in the original comments, DEC plans to file an AMI meter opt-out tariff so that these incremental costs are covered by the customers choosing to opt-out. DEC would propose that customers who have currently been by-passed would be allowed to continue to opt-out if they comply with the terms of a forthcoming Commission-approved opt-out tariff. DEC would maintain and support this AMI opt-out tariff as long

¹ The Federal Communications Commission ("FCC") standards (*Parts 1 and 2 of the FCC's Rules and Regulations* [47 C.F.R. 1.1307(b), 1.1310, 2.1091, 2.1093]) for intentional and unintentional radio emissions and safety related to RF exposure govern the certification and design of all RF consumer devices, including communicating meters.

as it is approved by the Commission and subject to any future changes that the Company may request and as may be approved by the Commission.

Respectfully submitted, this the 7th day of December, 2015.

A handwritten signature in black ink, appearing to read "Lawrence B. Somers", written over a horizontal line.

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CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC's Supplemental Comments on Advanced Metering Infrastructure Customer Opt-Out Requests in Docket No. E-100, Sub 141, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties of record:

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This is the 7th day of December, 2015.

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