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May 1, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Progress, LLC's Update to November 14, 2017 Response
to Commission Request for Information
Docket No. E-2, Sub 1150**

Dear Ms. Campbell:

In response to an inquiry from Commission staff, I write on behalf of Duke Energy Progress, LLC ("DEP" or the "Company") to provide an update to the Company's November 14, 2017 response to the Commission's November 13, 2017 *Order Requiring Additional Information* for filing in connection with the referenced matter.

First, as an update to the Company's response to Question 1 regarding the status of an archaeological survey recommended by the State Historic Preservation Office ("SHPO") of the North Carolina Department of Natural and Cultural Resources, SHPO in its comments to the State Clearinghouse had recommended an archaeological survey pursuant to Section 106 of the National Historic Preservation Act of 1966 (as amended), based on the assumption that Section 106 would apply to the Cleveland-Matthews Transmission Line Project (the "Project"). In this case, however, the Project did not require any federal permits or funding, and therefore Section 106 was inapplicable. As a result, no archaeological surveys were required to obtain and meet permit conditions required for clearing and construction of the Cleveland-Matthews line.

Notwithstanding the fact that no archaeological survey was required, DEP met with SHPO to discuss the Project during the siting phase (prior to the application for a certificate of public convenience and necessity) and reviewed the files at the Office of State Archaeology and SHPO: no previously-recorded archaeological or architectural resources were documented in the study area. I attach the archaeological review section of the

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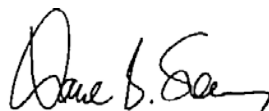
Cleveland-Matthews line siting report (see Attachment 1, Section 5.0 Cultural Resources and page 17 concluding that Section 106 did not apply) prepared by DEP's siting consultant, which documented these findings.

As an update to the Company's response to Question 2 regarding the North Carolina Wildlife Resources Commission's recommendation that DEP conduct an aquatic species survey at the Cleveland-Matthews line's Middle Creek crossing location, I enclose as Attachment 2 a report by Alderman Environmental Services, Inc. which conducted the survey and concluded in June 2018 that there was "No Effect" on the target species.

As an update to the Company's response to Question 3 regarding DEP's discussions with impacted landowners who would like changes in DEP's proposed route, DEP received a request from Benjamin Johnson and his brother, John Johnson III, owners of the following parcels impacted by the selected line route: PIN 164500-14-9085, 164500-12-1781 and 164500-01-8670. These parcels total more than 240 acres and are generally located east of the intersection of Raleigh Road and Sonny Road at the northern end of the Cleveland-Matthews line. The Johnson brothers also own (jointly or individually) at least six additional outparcels immediately adjacent to the east of the above-referenced parcels and which are currently leased for mobile home sites along Mathews Road. The brothers requested that a point of intersection be relocated east on parcel 164500-01-8760. This resulted in movement of the line route towards the eastern edges of the larger Johnson tracts and closer to the residential uses (again, all residential parcels owned by the Johnsons). Other than this request, there were no additional line relocation requests received from landowners beyond those listed in the Company's original response.

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", with a stylized flourish at the end.

Lawrence B. Somers

Enclosures

cc: Parties of Record

4.1.4 Alluvial Forest

This community type is located on floodplains in which separate fluvial landforms and associated vegetation zones are too small to distinguish. This community type includes tree species such as black tupelo, red bay, red maple, sweetgum, tulip tree, and water oak.

Wetlands within this community were given the Cowardin classification of palustrine forested wetland (PFO). Common wetland plants observed throughout this community include giant cane, sedges, netted chain fern (*Woodwardia areolata*), soft rush, and wool grass.

Table 3. Coverage of terrestrial communities in the study area

Community	Coverage (ac.)	Percent of study area
Maintained/ Disturbed	159.8	44.2%
Pine Flatwoods	25.9	7.2%
Loblolly Pine Plantation	50.0	13.8%
Alluvial Forest	125.8	34.8%
Total	361.5	100%

5.0 CULTURAL RESOURCES

A check of site files housed at the Office of State Archaeology and on the online GIS system maintained by the North Carolina Historic Preservation Office was conducted on September 25, 2017.

5.1 Archaeological Resources

No previously-recorded archaeological resources are present within the study area. Twelve previously-recorded archaeological sites exist within one mile of the study area. Four of the sites are located within 500 feet of the northern edge of the study area. The other resources are located at least half a mile from the study area. Four of the resources have not been evaluated for their eligibility for listing on the National Register of Historic Places (NRHP), and the remaining eight have been determined not eligible for the NRHP.

5.2 Historic Architectural Resources

No historic architectural resources are located within the study area. Thirty-two previously-recorded historic structures are located within one mile of the study area. Two of these resources, the Walter R. and Eliza S. Moore House (JT0242) and the Cleveland School (JT0708), were listed on the NRHP in 2005. The Moore House is located in Willow Springs just over 0.4 miles west of the northern end of the study area. The Cleveland School is located approximately 0.9 miles northwest of the northern edge of the study area. The thirty remaining resources include four individual properties that are no longer extant, four that have been placed on the North Carolina Study List (meaning the resource is potentially eligible for the NRHP but would require additional study to make an informed eligibility determination), four additional Study List

properties that are no longer extant, and 18 resources that have been recorded but not assessed for NRHP eligibility.

6.0 REGULATORY ISSUES

6.1 Clean Water Act Waters of the U.S

Jurisdictional waters of the United States, including wetlands, are protected under Section 404 of the Clean Water Act (CWA). The USACE and US Environmental Protection Agency (USEPA) jointly define wetlands as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas” (Wetlands Definitions. Code of Federal Regulations, Title 40, Pt. 230.3, Revised 2004.) The USACE’s 1987 Wetlands Delineation Manual, as amended by the 2010 Atlantic and Gulf Coastal Plain regional supplement, requires evidence of hydric soils, positive hydrological indicators, and a prevalence of hydrophytic vegetation for determination that an area is a wetland. Section 404 jurisdictional waters other than wetlands include streams, rivers, and lakes. Presence of an ordinary high water mark (OHWM) and a continuous bed and bank are used to identify streams and tributaries.

Both federal and state programs regulate activities conducted in wetlands in order to minimize the continued reduction and degradation of these resources and strive to achieve a “no net loss” policy. The federal program is based on Section 404 of the CWA and the USACE’s implementing regulations (33 CFR Parts 320-330). The NCDWR is tasked with administering Section 401 of the CWA.

6.1.1 Identified Jurisdictional WOUS Features

6.1.1.1 Streams

Twenty-eight streams were identified within the study area (Table 2) (Appendix A, Figure 5). If permanently impacted, compensatory mitigation would be required for these streams. Twenty-seven of the streams are subject to riparian buffer rules. Representative photographs are located in Appendix D

6.1.1.2 Wetlands

Twenty-six wetlands were identified within the study area (Table 4) (Appendix A, Figure 5). USACE wetland delineation forms are included in Appendix E, and representative photographs are located in Appendix D.

were conducted as part of this study. NCNHP records list occurrence of the dwarf wedgemussel and the yellow lance in Middle Creek within the study area and along much of the length of Middle Creek outside of the study area were last observed in November 2016 and July 1999. Prior to any construction activities that may disturb habitat, consultation with the USFWS should be initiated to obtain their concurrence with the biological conclusion described in this report, “No Effect” for Red-cockaded woodpecker and Michaux’s sumac, and “May Affect, Not Likely to Adversely Affect” for the mussel species. Moreover, the USFWS should be consulted to determine if additional surveys would be required.

No historic or archaeological resources listed in or eligible for listing in the NRHP are recorded immediately within the study area. No federal funding or permitting is anticipated, and the project does not cross federally-owned or controlled lands. Therefore, the project is not likely to require compliance with Section 106 of the National Historic Preservation Act of 1966 (as amended). As such, no cultural resources studies are anticipated to be required in conjunction with the project.



Alderman Environmental Services, Inc.

8 June 2018

PROJECT: Mussel Survey at Middle Creek
 Duke Energy Progress
 Cleveland Matthews Road 230kV Transmission Line
 Johnston County, North Carolina

TARGET SPECIES: Dwarf Wedgemussel (*Alasmodonta heterodon*)
 Atlantic Pigtoe (*Fusconaia masoni*)
 Yellow Lance (*Elliptio lanceolata*)
 Green Floater (*Lasmigona subviridis*)
 Yellow Lampmussel (*Lampsilis cariosa*)

Staff: John M. Alderman
 Joseph D. Alderman
 J. Logan Williams

STATION 180607.1

LOCATION: Middle Creek; 750+ meter reach of stream associated with a potential power line crossing of two areas of the creek (100+ meters upstream from upper corridor to 400+ meters downstream from lower corridor); Johnston County, NC; **see associated map at end of report**

SURVEY DATE: 8 June 2018

SITE COMMENTS: Excellent survey conditions: water relatively low, clear to slightly turbid; heavy sediment load

HABITAT

WATERBODY TYPE:	Stream
FLOW:	Run, riffle, slack
RELATIVE DEPTH:	Very shallow
DEPTH (% < 2 FEET):	80
SUBSTRATE:	Clay, silt, sand , gravel, woody debris
COMPACTNESS:	Normal and unconsolidated
SAND/GRAVEL BARS:	Common
WOODY DEBRIS:	High

HABITAT (CONTINUED):

BEAVER ACTIVITY:	Evidence (gnawed sticks)
WINDTHROW:	Moderate
TEMPORARY POOLS:	Present
CHANNEL WIDTH:	18 m
BANK HEIGHT:	~2 m
BANK STABILITY:	Some erosion/undercutting
BUFFER WIDTH:	Wide
RIPARIAN VEGETATION:	Wooded, shrub-brush, grass
LAND USE:	Natural, timber, grass, rural
PERCENT COVER:	15
WOODLAND EXTENT:	Extensive right, extensive left
NATURAL LEVEES:	At least one
VISIBILITY:	Clear to slightly turbid
WATER LEVEL:	Normal
WEATHER:	Sunny, warm

TECHNIQUES AND SURVEY TIME:

TECHNIQUES:	Visual, tactile, bathyscope
SURVEY TIME:	7.5 Person-hours

Freshwater Mussels (no federally listed species documented):

Eastern Elliptio (*Elliptio complanata*) – 636 live

Variable Spike (*Elliptio icterina*) – 7 live

Eastern Lampmussel (*Lampsilis radiata*) (State Threatened) – 1 live

Creeper (*Strophitus undulatus*) (State Threatened) – 1 live

Eastern Pondhorn (*Uniomerus carolinianus*) – 1 live, 1 shell

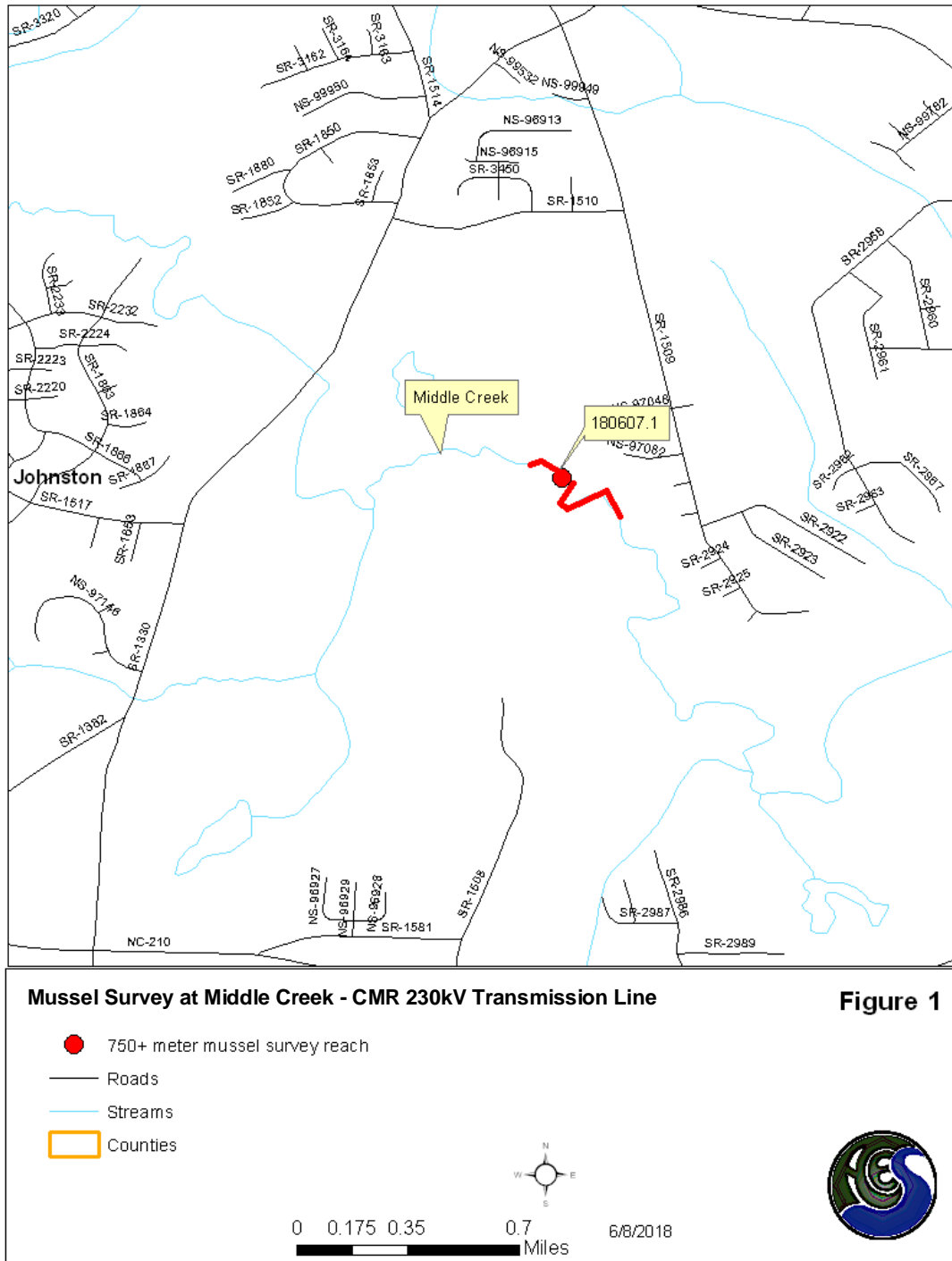
Other Documented Taxa:

***Campeloma decisum* – 10 live**

Asian Clam (*Corbicula fluminea*) – rare

Biological Conclusion:

Since there are no modern records for the target species in Middle Creek Subbasin, and these species were not documented within the required survey reach, the Biological Conclusion is “No Effect” on these target species.



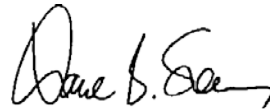
CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Progress, LLC's Update to November 14, 2017 Response to Commission Request for Information, in Docket No. E-2, Sub 1150, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties:

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Or
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This the 1st day of May, 2020.



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