

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1287

DOCKET NO. E-7, SUB 1261

In the Matter of)
 Application of Duke Energy Progress, LLC)
 For Approval of Smart Saver Solar Energy)
 Efficiency Program Pursuant to N.C. Gen.)
 Stat. § 62-133.9 and Commission Rule R8-68)

**COMMENTS OF THE SOLAR
 ENERGY INDUSTRIES
 ASSOCIATION**

In the Matter of)
 Application of Duke Energy Carolinas, LLC)
 For Approval of Smart Saver Solar Energy)
 Efficiency Program Pursuant to N.C. Gen.)
 Stat. § 62-133.9 and Commission Rule R8-68)

Pursuant to North Carolina Utilities Commission (“Commission”) Rule R8-68 and the Commission’s February 25, 2022 Order Granting Second Extension of Time, the Solar Energy Industries Association (“SEIA”) hereby submits the following comments in support of the Smart Saver Solar Energy Efficiency Programs (“Solar Efficiency Incentive”) put forward by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (collectively, the “Companies”).

The Solar Efficiency Incentive is a foundational part of reforms to North Carolina’s long-standing net metering (“NEM”) policy being considered in Docket No. E-100, Sub 180. This holistic proposal (i.e., NEM reforms + the Solar Efficiency Incentive) presents a creative resolution to a policy debate that has been one of the more contentious issues before state utility commissions over the last decade. Recent regulatory and legislative battles over net metering in California, Florida, Arizona, and Nevada have proven to be very contentious, expensive, and consequential for stakeholders, with uncertainty whipsawing the solar industry when structural changes to net metering are on the table.

The Solar Efficiency Incentive is the cornerstone of a compromise among stakeholders and both it and NEM reforms are designed to work in tandem. Absent either, the balance of NEM reforms and additional policy objectives of this program will fall short of its potential to transform the energy policy landscape in North Carolina and hamstringing consumers' role in the energy future by eliminating options for those consumers to participate in the energy economy.

In light of the clean energy policy objectives of North Carolina, and the forthcoming pressures to identify least cost solutions to decarbonize the Companies' generation fleet in North Carolina, SEIA encourages the Commission to consider the significant role that cost-effective customer-sited demand-side and energy efficiency programs could have in fulfilling the Commission's mandate to these goals.

SEIA encourages the Commission to exercise its broad authority to approve the Solar Efficiency Incentive as a program that: (1) achieves reduction of electric load and demand on the grid, (2) improves system efficiencies by leveraging solar and demand response to make customer load more flexible, (3) reduces carbon by encouraging clean, behind-the-meter generation to meet onsite load (avoiding inefficiencies of line losses and delivery) and shifting participant's usage to off-peak periods with likely lower carbon intensity, and (4) gives consumers a meaningful opportunity to achieve bill savings in a manner that aligns with reductions in system costs.

SEIA respectfully requests that the Commission find that energy efficiency includes the suite of new behind-the-meter and grid reactive technologies that enable customers to achieve system efficiency and resilience of onsite usage in new and more sophisticated ways. The Solar Efficiency Incentive represents the first step in a new era of

customer-sited distributed energy resources policy in North Carolina that embraces innovation, encourages economic development, creates good-paying clean energy jobs, and provides a model for balancing the cost constraints and competing interests associated with the clean energy transition. For these reasons, SEIA respectfully requests that the Commission approve the Solar Efficiency Incentive.

Respectfully submitted this 15th day of March, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Comments of the Solar Energy Industries Association as filed today in Docket No. E-2, Sub 1287, and Docket No. E-7, Sub 1261 has been served on all parties of record on the official service list by electronic mail transmission, where parties have consented to electronic service, or by deposit in the U.S. Mail, first class, postage prepaid, on this day, March 15, 2022.

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