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August 2, 2021

VIA ELECTRONIC FILING

Ms. A. Shonta Dunston
Interim Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Progress, LLC's DSDR-to-CVR Conversion Filing
Docket No. E-2, Sub 926 and E-100, Sub 165**

Dear Ms. Dunston:

Pursuant to the *Order Accepting Stipulations, Granting Partial Rate Increase, and Requiring Customer Notice*, issued April 16, 2021 in Docket Nos. E-2, Sub 1219 and E-2, Sub 1193 (the "Order"), I enclose for filing in connection with this matter Duke Energy Progress, LLC's ("DEP" or the "Company") filing pertaining to the Company's proposed conversion of the Distribution System Demand Response ("DSDR") program to the Conservation Voltage Reduction ("CVR") program. The Order required that DEP determine the amount of peak reduction capacity that will be lost due to the conversion and propose a method of replacing the lost capacity; file a revised DSDR-to-CVR conversion cost-benefit analysis that incorporates the cost of replacing any lost peak reduction capacity; and file an updated report that estimates CVR's anticipated capital and O&M costs, peak reduction, and energy savings for the next 10 years.

If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

Jack E. Jirak

Enclosures

cc: Parties of Record

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Duke Energy Progress, LLC
DSDR-to-CVR Program Analysis
Docket No. E-100, Sub 165
Docket No. E-2, Sub 926
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Introduction

The North Carolina Utilities Commission's (the "Commission") April 26, 2021 *Order Accepting Stipulations, Granting Partial Rate Increase and Requiring Customer Notice*, in Docket No. E-2, Sub 1219 (the "Order"), requires Duke Energy Progress, LLC ("DEP" or the "Company") to provide the following information by August 1, 2021 regarding its proposed Distribution System Demand Response ("DSDR") conversion to Conservation Voltage Reduction ("CVR") project:

1. Determine the amount of peak reduction capacity that will be lost due to the conversion and propose a method of replacing that lost capacity in Docket No. E-100, Sub 165 (IRP docket);
2. File in the IRP docket and Docket No. E-2, Sub 926 (Sub 926) a revised DSDR-to-CVR conversion cost-benefit analysis that incorporates the cost of replacing any lost peak reduction capacity; and
3. File an updated report in the IRP docket and Sub 926 that estimates CVR's anticipated capital and O&M costs, peak reduction, and energy savings for the next 10 years.

The following DSDR-to-CVR conversion project information is being provided in accordance with the requirements of the Order.

Project Overview and Peak Reduction Capacity

This analysis provides an update to the original analysis for the DSDR-to-CVR project provided in the 2020 IRP and the 2019 DEP general rate case filings¹. This project will move DEP from a predominant DSDR (peak shaving) operational strategy to a Conservation Voltage Reduction (CVR) operational strategy. The DSDR and CVR modes of operation would be implemented by software within a centralized Distribution Management System (DMS). CVR would be a DMS function that would support voltage reduction and energy conservation on a year-round basis, for approximately 90% of the hours in the year, as opposed to peak shaving conditions. The original analysis assumed that if the DMS system was operating in CVR mode, transitioning to DSDR mode when load has already been reduced would not provide the level of DSDR peak shaving benefit realized today.

Future enhancements to the DMS are needed to ensure the operability of a CVR mode. Once the DMS can support a CVR mode, this would allow cost effective decision-making for different modes of operation based on system conditions. Therefore, coming out of conservation voltage reduction for forecasted peak demand events would allow the system to return to a DSDR mode

¹ Docket No. E-2, Sub 1219

Duke Energy Progress, LLC
DSDR-to-CVR Program Analysis
Docket No. E-100, Sub 165
Docket No. E-2, Sub 926
August 2021

that enables peak shaving capabilities currently in place today. With further enhancements, the flexibility of the system should provide both capacity and energy saving capabilities while simultaneously preserving options for efficient management of the grid.

Based on updated assumptions, the Company does not expect that changing the predominant operational strategy in DEP from DSDR to CVR will reduce peak shaving capability available today under DSDR. The next section provides an updated cost-benefit-analysis that reflects no assumed reduction in DSDR peak shaving capability.

Cost-Benefit Analysis

The updated DSDR-to-CVR cost benefit analysis is included in Appendix A. The updated analysis reflects no additional costs for replacing lost peak reduction capacity, since there is no assumed reduction in DSDR peak shaving capability. Additionally, the updated analysis aligned its assumptions with the 2020 IRP’s avoided costs decline compared to the 2018 IRP. These drivers have led to a reduction in the benefit-cost ratio for this project as shown Table 1 below. Importantly, the updated analysis continues to show this program is beneficial to customers.

Table 1: Benefit-to-Cost results

<u>Original CBA from 2018 IRP</u>	<u>Updated CBA from 2020 IRP</u>
<u>31.5</u>	<u>23.9</u>

Ongoing Program Costs

Table 2 below provides the 10-year forecast for the incremental capital and O&M costs to prepare the system to move to CVR as the predominant operational strategy. Once this four-year transition is complete we do not anticipate incremental cost in subsequent years beyond those already required to operate and maintain DSDR which are currently reported in the Distribution System Demand Response Program Implementation Status Report that is filed in Docket No. E-2, Sub 926.

Table 2: CVR Capital and O&M

(\$ in 000’s)

<i>Year:</i>	2021	2022	2023	2024	2025	2026	2027	2028	2029	2029
Capital	\$ 2,233	\$ 2,287	\$ 2,335	\$ 2,387	0	0	0	0	0	0
O&M	\$ 20	\$ 20	\$ 21	\$ 21	0	0	0	0	0	0

**Duke Energy Progress, LLC
DSDR-to-CVR Program Analysis
Docket No. E-100, Sub 165
Docket No. E-2, Sub 926
August 2021**

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Aug 02 2021

Table 3: Load Reduction (MW) and Energy Reduction (MWH)

DEP (NC & SC) DSDR to CVR (Conservation Voltage Reduction) Conversion				
MW & MWH Reduction Forecast ¹				
			CVR ²	CVR ²
	Conservation Voltage Reduction [CVR] Deployment (%)		Demand Load Reduction (MW)	Energy Reduction (MWH)
2021	0%	<i>CVR Not Applicable</i>	Not Applicable	Not Applicable
2022	0%	<i>CVR Not Applicable</i>	Not Applicable	Not Applicable
2023	10%	<i>Ramp up CVR³</i>	9	38,777
2024	20%	<i>Ramp up CVR³</i>	17	78,252
2025	100%		88	394,782
2026	100%		89	398,335
2027	100%		90	401,920
2028	100%		91	405,537
2029	100%		91	409,187
2030	100%		92	412,870
2031	100%		93	416,586
2032	100%		94	420,335
2033	100%		95	424,118
2034	100%		96	427,935

¹Line Loss Savings are excluded. Line loss savings represent the reduction of distribution system electrical losses due to DSDR Feeder Conditioning improvements.

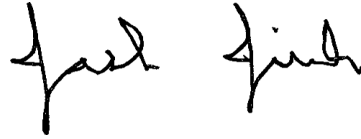
² CVR is anticipated to run 90% of the hours in the year

³ Estimated project timeline subject to change as the project progresses.

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Progress, LLC's DSDR-to-CVR Conversion Filing, in Docket Nos. E-2, Sub 926 and E-100, Sub 165, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to parties of record.

This the 2nd day of August, 2021.

Handwritten signature of Jack E. Jirak in black ink.

Jack E. Jirak
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