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February 11, 2021

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 Carolinas, LLC, Duke Energy Progress, LLC and
Piedmont Natural Gas Company, Inc.'s Notification of Change to
Winter Moratorium
Docket Nos. E-7, Sub 1236; E-2, Sub 1228; G-9, Sub 767; M-100, Sub
158; E-7, Sub 1241 and E-2, Sub 1258**

Dear Ms. Campbell:

In response to the financial hardships on low-income households as a result of the COVID-19 pandemic, I write on behalf of Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP") and Piedmont Natural Gas Company, Inc ("PNG") (collectively, "Duke Energy") to notify the Commission that Duke Energy plans to broaden the winter disconnection moratorium for some of the most vulnerable members of our communities by expanding eligibility to include all Low-Income Energy Assistance Program ("LIEAP") and Crisis Intervention Program ("CIP") beneficiaries. This change will remove the potential for a disconnection of service for non-payment for the timeframe of the winter moratorium, provide additional time to access LIEAP and other assistance funds, and allow a transition to manageable payments for remaining balances at the end of the winter heating season.

Under normal circumstances, pursuant to NCUC Rules R12-11(l)(6) and R12-10(h)(6), Duke Energy's residential customers in North Carolina may qualify for a disconnection moratorium from November 1 to March 31 if they are certified by the local social service office which administers the Energy Crisis Assistance Program or other similar programs as being eligible to receive assistance under such programs (e.g., LIEAP-eligible), if they are suffering financial hardship that prevents them from being able to afford their bills or a 6-month payment arrangement, and if they have a household member who is handicapped and/or elderly (65 or older) or both. Duke Energy will broaden eligibility for the winter moratorium to include all LIEAP and CIP beneficiary customers

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and will grant DEP and PNG customers a 12-month payment arrangement on an opt-out basis for their outstanding balances prior to their April 2021 bill.¹ However, DEP and PNG customers who are: (1) enrolled in the winter moratorium program, (2) already on a payment arrangement, (3) remain current on the payment arrangement, and (4) have no new arrearages accumulate during the moratorium period, will not be automatically placed on a new 12-month payment arrangement. The Company will, however, inform these customers that they may request a new 12-month payment arrangement if they prefer that to their current payment arrangement. Due to the timing of the DEC Customer Connect deployment in April 2021, DEC will grant affected customers a 12-month payment arrangement on an opt-out basis for their outstanding balance prior to their May 2021 bill unless their account was already enrolled in a payment arrangement at conversion. DEC customers already enrolled in an active payment arrangement at conversion will keep the same installment amount as established prior to conversion. However, these customers may request a 12-month payment arrangement.

Duke Energy will work with the North Carolina Department of Health and Human Services (“NCDHHS”) to identify the North Carolina customers that currently receive, or received during the 2019-2020 winter season, assistance through LIEAP or CIP. Both programs are components of the federal Low-Income Home Energy Assistance Program. For those beneficiaries identified, Duke Energy will proactively apply the moratorium. Individuals newly eligible for either LIEAP or CIP that are identified by NCDHHS or its agents through March 31 will also be enrolled in the moratorium upon notification from NCDHHS.

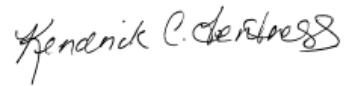
Duke Energy will notify each eligible customer, via letter, about the details of the moratorium and the post-moratorium payment arrangement. The letter will invite them to contact Duke Energy if they wish to opt out of the moratorium or the post-moratorium payment arrangement. It will also encourage customers to apply for LIEAP and other available energy assistance funds. Prior to issuing the first post-moratorium bill to customers enrolled in the payment arrangement, Duke Energy will send each customer a letter with their new payment arrangement details. The letter will explain that no contact from the customer will be required to accept the deferred payment arrangement, that they can take advantage of Duke Energy’s ongoing flexibility provisions and/or make accelerated payments on their payment arrangement once it is in effect. The letter will once again invite the customer to contact Duke Energy if they wish to opt out of the deferred payment arrangement or discuss alternate terms. Additionally, digital communications will supplement the letters to reinforce awareness of the moratorium, availability of additional assistance funding, and action needed to opt out of payment arrangements at the end of the moratorium.

¹ Commission Rule R12-11(r) and Commission Rule R12-10(n) allow DEC, DEP and Piedmont reasonable discretion in waiving or extending the times pertaining to termination of service, particularly when such waiver or extension would result in the prevention of undue hardship in those cases where termination of service would be especially dangerous to health or where the customer or a member of the customer's household is elderly or handicapped.

Duke Energy has met with the Public Staff and Attorney General's Office regarding this proposal and is authorized to represent to the Commission that the Public Staff and Attorney General's Office support this expansion of the winter disconnection eligibility and deferred payment arrangement plan.

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

Sincerely,

A handwritten signature in black ink that reads "Kendrick C. Fentress". The signature is written in a cursive style with a large, stylized "K" and "F".


Kendrick C. Fentress

cc: Parties of Record

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Piedmont Natural Gas Company, Inc.'s Notification of Change to Winter Moratorium, in Docket Nos. E-7, Sub 1236; E-2, Sub 1228; G-9, Sub 767; M-100, Sub 158; E-7, Sub 1241 and E-2, Sub 1258, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This, the 11th day of February, 2021.



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