

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 180
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
)	SOUTHERN ALLIANCE FOR
Investigation of Proposed Net Metering)	CLEAN ENERGY, VOTE SOLAR,
Policy Changes)	AND NORTH CAROLINA
)	SUSTAINABLE ENERGY
)	ASSOCIATION'S RESPONSE TO
)	JOINT MOTION FOR
)	EVIDENTIARY HEARING
)	

Pursuant to the Commission's June 20, 2022 Order, the Southern Alliance for Clean Energy (SACE) and Vote Solar, jointly with the North Carolina Sustainable Energy Association (NCSEA), respond to the Joint Motion for an Evidentiary Hearing submitted by the Environmental Working Group, 350 Triangle, 350 Charlotte, the North Carolina Alliance to Protect Our People and the Places We Live, NC WARN, North Carolina Climate Solutions Coalition, and Sunrise Movement Durham Hub (collectively, Joint Movants).

As previously noted, SACE, Vote Solar, and NCSEA are parties to the memorandum of understanding (MOU) with Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, the Companies or Duke Energy) for a package deal of net energy metering (NEM) reforms as required by N.C. Gen. Stat. § 62-126.4 (enacted in House Bill 589, S.L. 2017-192), including the proposed new Smart \$aver Solar incentive pending in Docket Nos. E-2, Sub 1287 and E-7, Sub

1261. Accordingly, SACE, Vote Solar, and NCSEA support adoption of the package of new net metering rates, including the Bridge Rate and related provisions of the Stipulation of Duke Energy and Sundance Power Systems, Inc., Southern Energy Management, Inc., and Yes Solar Solutions (collectively, NC Rooftop Solar Installers) filed on May 19, 2022. SACE, Vote Solar, and NCSEA believe that the extensive paper record provides the Commission with the information that it needs to approve these groundbreaking settlements between Duke Energy, the NC Rooftop Solar Installers, solar energy industry representatives, clean energy, and environmental advocates.

In addition, SACE, Vote Solar, and NCSEA participated in the Comprehensive Rate Review meetings during which Duke Energy first provided extensive information to stakeholders regarding its analyses of benefits and costs relating to net metering and the reasons why it planned to propose TOU-CPP rates for NEM. The Fast Track working group of the Comprehensive Rate Review accommodated different points of view and invited all participants, which included at least one of the Joint Movants, to bring forward alternative rate design ideas for consideration. SACE, Vote Solar, and NCSEA have no objection to further study of the benefits and costs of rooftop solar, an issue that will need to be periodically revisited to properly account for rooftop solar's contribution to carbon reduction goals and resiliency benefits, to name just two. But as noted previously in our Joint Reply Comments, we remain concerned about the potential for undue delay in these proceedings because of the inherent uncertainty about future net metering rates under the terms of N.C.G.S. § 62-126.4 and the expiration of rooftop solar

incentives at the end of this year. Because rooftop solar is a long-term investment, uncertainty about what NEM compensation will be in four and a half years will make it increasingly difficult for installers to responsibly sell solar PV systems.

In sum, SACE, Vote Solar, and NCSEA do not require an evidentiary hearing to ensure that their perspectives are heard in this docket and do not think it is workable to delay consideration of these matters pending the completion of another study. Nevertheless, SACE, Vote Solar, and NCSEA are prepared to participate in any hearing that the Commission deems necessary before ruling on the issues relating to the Stipulations with Duke Energy in this or related dockets.

Respectfully submitted this the 24th day of June, 2022.

/s/ David L. Neal
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CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Joint Motion for Evidentiary Hearing either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 24th day of June, 2022.

/s/ David L. Neal
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