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November 14, 2022

VIA ELECTRONIC FILING

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

**RE: Letter in Lieu of Reply Comments
Docket Nos. E-2, Subs 1193 and 1219; E-7 Subs 1187, 1213, and 1214;
G-5, Subs 632 and 634; and G-9, Subs 722, 781, and 786**

Dear Ms. Dunston:

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together the “Companies”) respectfully submit this letter in lieu of reply comments in response to the North Carolina Utilities Commission’s (“Commission”) *Order Allowing the Filing of Comments* (“Order”) in the above-referenced dockets. The Order allowed parties to file comments and reply comments in response to the joint Final Report and Recommendations of the North Carolina Low-Income Affordability Collaborative (“Final Report”) filed on August 12, 2022 in the above-referenced dockets by the Companies and the Public Staff – North Carolina Utilities Commission (“Public Staff”).

On October 24, 2022, the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together, “CIGFUR”), the Southern Alliance for Clean Energy (“SACE”), and the North Carolina Justice Center, the Sierra Club, and the Southern Environmental Law Center (“SELC et al.”) filed comments in response to the Final Report. The Companies file this letter in lieu of reply comments because they believe the Final Report provides the Commission with the Companies’ perspective regarding the topics addressed by CIGFUR, SACE, and SELC et al. in their initial comments. The Companies do, however, acknowledge CIGFUR’s comments regarding the Customer Assistance Program as proposed in the Final Report and note for the Commission that the Customer Assistance Program was filed for approval in DEP’s general rate case in Docket No. E-2, Sub 1300 on October 6, 2022. CIGFUR’s Initial Comments at 4-5. The Companies also acknowledge SELC et al.’s comments regarding data sharing and note for the Commission that several of SELC et al.’s comments regarding data sharing are being addressed in the pending data access rulemaking proceeding in Docket No. E-100, Sub 161. SELC et al.’s Initial Comments at 6-7.

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The Companies also specifically note SELC et al.'s comments regarding income eligibility for participation in programs to address affordability. In their comments, SELC et al. recommends that the Commission should accept the Companies' and Public Staff's recommendation to consider customers who are at or below 200% of the federal poverty level ("FPL") for purposes of eligibility for participation in programs to address affordability and reject the proposal made by the Companies' in its proposed Carbon Plan to increase eligibility for income-qualified EE programs to 300% of the FPL. SELC et al.'s Initial Comments at 7. The Companies disagree with SELC et al.'s recommendation and contend that the Companies' LIAC analysis results show customers above 200% of the FPL experience affordability challenges. The proposed enabler expanding the definition of low-income to 300% of the federal poverty guideline is designed to assist these customers. The enabler was identified as a way to recognize a larger pool of eligible customers, if approved by the Commission in future program filings, to allow for more customer participation and more energy efficiency savings.

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

Sincerely,



Kathleen H. Richard

cc: Parties of Record

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Letter in Lieu of Reply Comments, in Docket Nos. E-2, Subs 1193 and 1219; E-7 Subs 1187, 1213, and 1214; G-5, Subs 632 and 634; and G-9, Subs 722, 781, and 786, 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 14th day of November, 2022.



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