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February 18, 2022

VIA ELECTRONIC FILING

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

**Re: Duke Energy Carolinas, LLC's Request to Delay Filing of 2021 REPS
Compliance Report
Docket No. E-7, Sub 1264**

Dear Ms. Dunston:

Pursuant to N.C. Gen. Stat. § 62-133.8 and Commission Rule R8-67 relating to incremental costs for compliance with the renewable energy and energy efficiency portfolio standard ("REPS") for electric utilities, Duke Energy Carolinas, LLC ("DEC" or the "Company") is required to file its annual REPS cost recovery rider application and its 2021 REPS Compliance Report on March 1, 2022 (the "REPS Rider Application"). In preparation for filing the REPS Rider Application, the Company plans to retire renewable energy certificates ("RECs") for 2021 compliance. To retire the appropriate number of RECs, the Company needs to know the 2021 poultry waste requirement, which affects not only the amount of poultry RECs needed for retirement, but also the amount of general RECs (as the excess poultry RECs would be replaced by general REC retirements).

On September 30, 2021, a joint motion of various Electric Suppliers ("Joint Movants") was filed in Docket No. E-100, Sub 113, requesting the Commission to modify and delay the 2021 poultry and swine waste requirements. With respect to the poultry waste requirement, the Joint Movants specifically requested modification of their obligation for calendar year 2021 by using an aggregate set-aside requirement of 300,000 MWh for the Joint Movants, allocated based on the load ratio share calculations in the Commission's December 16, 2019 *Order Establishing 2019, 2020, and 2021 Poultry Waste Set-Aside Requirement Allocation*.

The Public Staff in its comments proposed "that the Commission set the 2021 compliance requirement for N.C.G.S. § 62-133.8(f) for **all electric power suppliers** at 300,000 MWh, the 2022 compliance requirement at 500,000 MWh, and the 2023 compliance requirement at 700,000 MWh. If the Commission were to adopt the Public Staff's proposal, the poultry waste set-aside requirement of all electric suppliers, including DEC, will be affected. The Commission's order will potentially impact the number of poultry waste, swine waste and general RECs that DEC will submit for compliance for

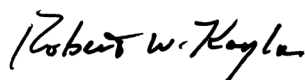
itself and also for the wholesale customers for whom the Company provides REPS services, in the upcoming REPS Rider Application.

DEC has been working actively on its REPS Rider Application, including the retirement of RECs for 2021 compliance. The procedure of selecting and retiring RECs is time-consuming, and to ensure successful completion of the intensive system process, DEC typically retires RECs over the weekend while NC-RETS system traffic is low. The Company had targeted the weekend of February 19, 2022 to submit RECs for retirement, allowing time to verify all RECs were transferred into the NC-RETS compliance subaccounts correctly, to calculate the cost of the RECs retired for compliance, and to compute the remaining REC bank. These three elements are recorded in the Compliance Report that is an exhibit to the REPS Rider Application. Please note that this delay request does not affect the REPS compliance costs the Company seeks to recover in this proceeding, only the costs of RECs retired as included in its 2021 REPS Compliance Report.

For the reasons set forth above, DEC respectfully requests that the Commission issue an expedited order to allow DEC to delay retirement of RECs for 2021 REPS compliance and to file the DEC REPS Compliance Report after the order on the Joint Movants' September 30, 2021 motion is issued in Docket No. E-100, Sub 113.

Please do not hesitate to contact me if you have any questions.

Sincerely,



cc: Dianna Downey
Megan Jost
Munashe Magarira