



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

September 26, 2023

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

Re: Docket Nos. E-2, Sub 931; E-7, Sub 1032, and E-100, Sub 179
The Public Staff's Response to Duke Energy Carolinas, LLC's and
Duke Energy Progress, LLC's Supplemental Response in Support of
Public Staff's Motion for Procedural Relief and Request for Further
Relief

Dear Ms. Dunston:

On September 20, 2023, Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC (together, Duke Energy or the Companies), filed a Supplemental Response in Support of the Public Staff's Motion for Procedural Relief and Request for Further Relief (Supplemental Response) in the above-captioned dockets, further expanding on the position set forth in the Companies' September 14, 2023, Response in Support of Public Staff's Motion for Procedural Relief and Request for Further Relief. In the Supplemental Response, Duke Energy explained that its request that the Commission approve a one-time, non-precedent setting reconciliation or "true up" of Vintage 2025 to reflect all Commission-approved changes to the Mechanism resulting from the Mechanism review in these dockets would provide clarity and certainty on how the underlying system benefits resulting from a demand-side management (DSM) or energy efficiency (EE) program will be determined such that Duke Energy can plan, propose, offer, and expand cost-effective programs for customers going forward and meet its Carbon Plan DSM/EE goals.

When the Companies proposed this concept to the parties, the Public Staff explained that, although it is not against the true-up per se, the Public Staff does not consider it in the public interest to agree in advance to impacts that are wholly unknown at this time. Instead, the Public Staff suggests that this issue should be part of the comprehensive Mechanism review, in which the potential true-up can be considered item by item with a full understanding of the implications thereof.

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The Public Staff continues to believe that this approach would best serve ratepayers. Until more is known about potential changes to the Mechanism, it is impossible to anticipate the impact of a one-time true-up on ratepayers. Therefore, the Public Staff respectfully requests that the Commission deny the Companies' request for a one-time true-up at this time but require the comprehensive Mechanism review to include consideration of whether any of the parties' proposed changes to the Mechanism should be applied retroactively or only prospectively, as well as the impact to rates and Duke Energy's meeting its Carbon Plan DSM/EE goals.

Sincerely,

Electronically submitted,
/s/ Anne M. Keyworth
Staff Attorney
anne.keyworth@psncuc.nc.gov

cc: Parties of Record