



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

August 25, 2020

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

Re: Docket No. E-2, Sub 1251 – Application of Duke Energy Progress, LLC Pursuant to G.S. 62-133.2 and Commission Rule R8-67 for Approval of REPS Compliance Report and REPS Cost Recovery Rider

Dear Ms. Campbell:

In connection with the above-referenced docket, I transmit herewith for filing on behalf of the Public Staff the following:

1. Confidential Testimony of Jay B. Lucas, Manager, Electric Section – Operations and Planning, Energy Division;
2. Notice of Affidavit; and
3. Affidavit of June Chiu, Staff Accountant, Accounting Division.

By copy of this letter, I am forwarding a copy of the redacted version to all parties of record by electronic delivery. The confidential version will be provided to those parties that have entered into a confidentiality agreement.

Sincerely,

Electronically submitted
/s/ Gina C. Holt
Staff Attorney
gina.holt@psncuc.nc.gov

/s/ Nadia L. Luhr
Staff Attorney
nadia.luhr@psncuc.nc.gov

Attachments

Executive Director (919) 733-2435	Communications (919) 733-5610	Economic Research (919) 733-2267	Legal (919) 733-6110	Transportation (919) 733-7766
Accounting (919) 733-4279	Consumer Services (919) 733-9277	Electric (919) 733-2267	Natural Gas (919) 733-4326	Water (919) 733-5610

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1251**

**TESTIMONY OF JAY B. LUCAS
ON BEHALF OF THE PUBLIC STAFF
NORTH CAROLINA UTILITIES COMMISSION**

August 25, 2020

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS FOR THE**
2 **RECORD.**

3 A. My name is Jay B. Lucas. My business address is 430 North
4 Salisbury Street, Raleigh, North Carolina.

5 **Q. WHAT IS YOUR POSITION WITH THE PUBLIC STAFF?**

6 A. I am the manager of the Electric Section – Operations and Planning
7 in the Public Staff's Energy Division.

8 **Q. WOULD YOU BRIEFLY DISCUSS YOUR EDUCATION AND**
9 **EXPERIENCE?**

10 A. Yes. My education and experience are summarized in Appendix A to
11 my testimony.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A. The purpose of my testimony is to make recommendations to the
14 Commission on the Renewable Energy and Energy Efficiency
15 Portfolio Standard (REPS) Compliance Report and the Application
16 for Approval of the REPS Cost Recovery Rider (REPS Rider) filed by

1 Duke Energy Progress, LLC (DEP, or the Company), on June 9,
2 2020. I also discuss the following REPS-related issues:

- 3 1. recovery of costs for the Competitive Procurement of
4 Renewable Energy (CPRE) Program in the REPS rider;
- 5 2. sales prices of certain renewable energy certificates (RECs);
6 and
- 7 3. the Public Staff's position on DEP's exclusion of Solar Rebate
8 Program costs from the REPS cost cap.

9 **REPS Compliance**

10 **Q. IS DEP PROVIDING REPS COMPLIANCE SERVICES TO ANY**
11 **OTHER ELECTRIC POWER SUPPLIERS?**

12 A. No.

13 **Q. PLEASE DESCRIBE THE 2019 REPS COMPLIANCE**
14 **REQUIREMENTS FOR DEP.**

15 A. For 2019 compliance, DEP needed to pursue retirement of a
16 sufficient number of general RECs,¹ energy efficiency certificates
17 (EECs), and RECs derived from other eligible sources so that the
18 total equaled 10% of its 2018 North Carolina retail electricity sales.
19 To meet the solar energy requirement in N.C. Gen. Stat. § 62-

¹ General RECs include all RECs other than those used to meet the solar, swine waste, and poultry waste set-asides. Unlike RECs used for the set-asides, general RECs and EECs are interchangeable for REPS compliance purposes, with the exception that EECs are limited to 25% of the total compliance requirement for the investor-owned utilities.

1 133.8(d), DEP needed to pursue retirement of sufficient solar RECs
2 to match 0.2% of its retail sales in 2018.

3 The Commission's December 16, 2019 *Order Modifying the Swine*
4 *and Poultry Waste Set-Aside Requirements and Providing Other*
5 *Relief* in Docket No. E-100, Sub 113, modified the requirements in
6 N.C.G.S. § 62-133.8(e) and (f) for swine and poultry waste energy,
7 respectively, as described below. To meet the swine waste set-aside
8 requirement, DEP needed to pursue retirement of sufficient swine
9 waste-derived RECs to match 0.04% of retail sales in 2018. To meet
10 the poultry waste set-aside requirement, DEP needed to pursue
11 retirement of sufficient poultry waste-derived RECs to match its pro-
12 rata share of the poultry waste set-aside of 500,000 MWh or the
13 thermal equivalent.

14 **Q. HAVE YOU REVIEWED THE REPS COMPLIANCE REPORT?**

15 A. Yes. DEP's REPS Compliance Report is included as Exhibit 1 to the
16 direct testimony of DEP witness Megan Jennings. Based on our
17 review, the Public Staff believes that DEP's REPS Compliance
18 Report meets the requirements of N.C.G.S. § 62-133.8 and
19 Commission Rule R8-67(c). Accordingly, the Public Staff
20 recommends that the Commission approve DEP's 2019 REPS
21 Compliance Report.

Research Costs

1

2 **Q. PLEASE DISCUSS THE RESEARCH COSTS DEP HAS**
3 **INCLUDED FOR COST RECOVERY.**

4 A. On pages 25 through 33 of her direct testimony, DEP witness Megan
5 Jennings summarizes the results of the 17 research expenditures for
6 which DEP is seeking cost recovery in this proceeding. The
7 anticipated research costs total \$931,500 in the billing period, which
8 is below the \$1,000,000 maximum annual amount allowed, as
9 specified in N.C.G.S. § 62-133.8(h)(1)(b). The included projects
10 generally regard operation of distributed energy resources (DERs)
11 and advancing the understanding of optimal ways to integrate DERs
12 and batteries into the power grid. DEP also included fees for
13 membership in research organizations.

14 **Q. DO YOU BELIEVE THAT ALL OF THE COSTS DEP HAS**
15 **INCLUDED QUALIFY AS RESEARCH “THAT ENCOURAGES**
16 **THE DEVELOPMENT OF RENEWABLE ENERGY, ENERGY**
17 **EFFICIENCY, OR IMPROVED AIR QUALITY,” CONSISTENT WITH**
18 **N.C.G.S. § 62-133.8(h)(1)(b)?**

19 A. Yes.

CPRE Program Costs

1

2 **Q. HAS DEP REQUESTED TO RECOVER ANY COSTS RELATED TO**
3 **THE CPRE PROGRAM IN THIS PROCEEDING?**

4 A. No, DEP has not included any costs related to the CPRE Program,
5 enacted in Session Law 2017-192 as part of North Carolina House
6 Bill 589 (HB 589), in this proceeding. DEP witness Jennings states
7 on page 14 of her direct testimony that DEP has elected to recover
8 the reasonable and prudent costs incurred to implement the CPRE
9 Program through the CPRE Rider. DEP included those costs in its
10 CPRE Program Rider filing in Docket No. E-2, Sub 1254, as
11 contemplated under Commission Rule R8-71(j). She also states,
12 however, that since DEP will use the RECs acquired through CPRE
13 for REPS compliance, the Company may propose to recover CPRE
14 Program implementation costs in future REPS proceedings.

15 **Q. DO YOU AGREE THAT DEP SHOULD RECOVER CPRE COSTS**
16 **THROUGH THE REPS RIDER?**

17 A. No. For the same reasons discussed in the testimony of Public Staff
18 witness Evan Lawrence in the 2019 Duke Energy Carolinas, LLC
19 (DEC), REPS Rider Proceeding in Docket No. E-7, Sub 1191, I do
20 not agree that DEP should recover CPRE implementation costs
21 through the REPS Rider. I agree, however, that it is difficult to
22 definitively make such a conclusion before this Commission has fully

1 considered CPRE costs in CPRE Program Rider filings or other
2 proceedings.

3 **Q. HAS DEP DISCUSSED THE RECOVERY OF CPRE COSTS IN**
4 **THE REPS RIDER IN OTHER PROCEEDINGS?**

5 A. Yes. In Docket No. E-100, Sub 150, DEP and DEC jointly filed their
6 Reply Comments and Amended Proposed Rule to Implement
7 N.C.G.S. § 62-110.8 on September 8, 2017. On page 13 of those
8 comments, DEP and DEC state:

9 Specific to the interrelationship with REPS, the
10 Companies do not anticipate any CPRE Program costs
11 being recovered through the REPS rider because N.C.
12 Gen. Stat. § 62-110.8(b)(2) caps CPRE Program PPA
13 purchases, including the cost of RECs, at or below the
14 Companies' avoided cost. Therefore, the full cost of
15 bundled CPRE Program RECs would be recovered
16 through the CPRE Program rider mechanism. Similar
17 to the approach used today for energy efficiency
18 credits applied towards REPS compliance, the cost of
19 RECs associated with renewable energy resources
20 procured under the CPRE Program would simply be
21 assigned \$0 cost for REPS compliance.

22 **Q. WHAT IS THE PUBLIC STAFF'S RECOMMENDATION WITH**
23 **REGARD TO THE RECOVERY OF CPRE COSTS IN THE REPS**
24 **RIDER?**

25 A. The Public Staff maintains its position that it is appropriate for CPRE
26 Program implementation costs to be recovered in a CPRE Program
27 Rider filing pursuant to Commission Rule R8-71(j). DEP should not
28 recover CPRE costs in the REPS rider.

Sale of RECs

1

2 **Q. PLEASE DESCRIBE THE DISCUSSIONS PERTAINING TO REC**
3 **SALES IN THE 2019 DEC REPS PROCEEDING.**

4 A. In the 2019 DEC REPS proceeding, Docket No. E-7, Sub 1191,
5 Public Staff witness Michelle Boswell raised the issue of the pricing
6 of animal waste set-aside RECs sold by DEC in her direct testimony
7 and recommended that DEC and the Public Staff work together over
8 the next year to review and evaluate the sale price of set-aside RECs
9 sold by DEC. In its E-7, Sub 1191 Order, the Commission directed
10 DEC and the Public Staff to work together to determine what, if any,
11 adjustments should be made to the current calculation of sales prices
12 of RECs sold by DEC to other electric power suppliers for the
13 purpose of those suppliers meeting their animal waste set-aside
14 requirements.

15 **Q. WHAT ASPECT OF THE SALE OF RECS BY DEP OR DEC ARE**
16 **YOU DISCUSSING IN YOUR TESTIMONY?**

17 A. One component of determining the sale price of RECs is to
18 determine the price at which DEP or DEC has purchased the RECs
19 from REC suppliers. I discuss my recommendation on the purchase
20 costs more fully below. My recommendation is in addition to those
21 made in the affidavit of Public Staff witness June Chiu in this
22 proceeding.

1 Q. WHAT OCCURRED THAT REQUIRED AN INVESTIGATION ON
2 THE SALE OF RECS?

3 A. Over the past four years, DEC has periodically sold set-aside RECs
4 to other electric power suppliers in order to assist with their REPS
5 compliance. The sale price of these RECs was determined using a

6 [BEGIN CONFIDENTIAL] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 [END CONFIDENTIAL].

18 Q. WHAT IS YOUR RECOMMENDATION REGARDING THE
19 PURCHASE PRICE OF RECS THAT DEP RESELLS?

20 A. DEC and the Public Staff had productive discussions on the
21 purchase price of RECs and reached an agreement. As discussed in
22 the supplemental testimony of DEC witness Megan Jennings filed on
23 May 15, 2020, in Docket No. E-7, Sub 1229, DEC will calculate the

1 sale price of any animal waste set-aside RECs based on a weighted
2 average price of RECs from all contracted and operational facilities
3 in DEC's and DEP's combined portfolio for each respective set-
4 aside. The Public Staff agrees with this proposal. The Public Staff
5 has not testified regarding REC sales by DEP in previous REPS
6 proceedings but recommends that any decisions by the Commission
7 on DEC's REC sales also apply to DEP.

8 **Solar Rebate Costs not applied to REPS Cost Cap**

9 **Q. PLEASE BRIEFLY DESCRIBE THE SOLAR REBATE PROGRAM**
10 **AND ITS RELATION TO REPS.**

11 A. Part VIII of HB 589, enacted in part as N.C.G.S. § 62-155(f), requires
12 certain electric public utilities, including DEP, to offer a Solar Rebate
13 Program. The law authorizes DEP to recover all reasonable and
14 prudent costs for the Solar Rebate Program through the REPS rider
15 pursuant to N.C.G.S. § 62-133.8(h). DEP is also permitted to use any
16 RECs created by the Solar Rebate Program for REPS compliance
17 purposes.

18 **Q. DID DEP INCLUDE COSTS FOR THE SOLAR REBATE**
19 **PROGRAM IN THE CURRENT RIDER PROCEEDING?**

20 A. Yes.

1 **Q. DID DEP APPLY THE SOLAR REBATE COSTS TOWARD THE**
2 **COST CAP IN N.C.G.S. § 62-133.8(h)(4)?**

3 A. No. In a data request, the Public Staff asked DEP to explain its
4 reasoning for not including costs for the Solar Rebate Program in its
5 calculation of REPS costs that it applies toward the REPS cost cap.
6 DEP explained that it had referred to the requirements for the annual
7 compliance report in Commission Rule R8-67(c)(1)(iv) and (v),

8 . . . which call for reporting the total and incremental
9 costs for complying with NC G.S. 62-133.8(b) through
10 (f) and comparing the incremental cost to the cost caps
11 times the number of accounts. NC G.S. 62-133.8(b)
12 through (f) establishes the overall REPS compliance
13 requirements for electric public utilities and
14 municipalities and EMCs, as well as the specific solar,
15 poultry, and swine set-aside requirements.

16 Since the Solar Rebate Program is not listed in N.C.G.S. § 62-
17 133.8(b), (c), (d), (e), and (f), DEP did not include its costs in the
18 incremental costs applied to the cost cap.

19 **Q. DO YOU AGREE WITH NOT APPLYING THE SOLAR REBATE**
20 **PROGRAM COSTS TOWARD THE REPS COST CAP?**

21 A. Yes. I agree with not applying the Solar Rebate Program costs to the
22 cost cap. REPS was created in 2007 by N.C.G.S. § 62-133.8, and its
23 cost caps apply only to the specific requirements of N.C.G.S. § 62-
24 133.8(b), (c), (d), (e), and (f) and the funding of research in sub-
25 subdivision (h)(1)b. HB 589 did not alter N.C.G.S. § 62-133.8(h)(4)

1 to include the Solar Rebate Program costs, which are included in
2 sub-subdivision (h)(1)d.

3 **REPS Rates**

4 **Q. WHAT RATES HAS DEP REQUESTED FOR ITS EMF AND REPS**
5 **RIDERS?**

6 A. In its Application, DEP requested the following monthly charges for
7 the Billing and Experience Modification Factor (EMF) components of
8 the total REPS rate, excluding the regulatory fee:

DEP's Rider Request Filed on June 9, 2020			
Customer Class	Billing Period Rate	EMF Rate	Total REPS Rate
Residential	\$1.29	\$0.00	\$1.29
General	\$7.71	\$(0.74)	\$6.97
Industrial	\$54.49	\$(6.67)	\$47.82

9 **Q. WHAT RATES DOES THE PUBLIC STAFF RECOMMEND FOR**
10 **THE EMF AND REPS RIDERS?**

11 A. The Public Staff agrees with the rates requested by DEP. These
12 monthly rates are below the cost caps set forth in N.C.G.S. § 62-
13 133.8(h)(4). With these recommended rates, the residential, general
14 service, and industrial classes are at approximately 57%, 56%, and
15 57% of their cost caps, respectively.

- 1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 2 A. Yes, it does.

QUALIFICATIONS AND EXPERIENCE

JAY B. LUCAS

I graduated from the Virginia Military Institute in 1985, earning a Bachelor of Science Degree in Civil Engineering. Afterwards, I served for four years as an engineer in the Air Force performing many civil and environmental engineering tasks. I left the Air Force in 1989 and attended the Virginia Polytechnic Institute and State University (Virginia Tech), earning a Master of Science degree in Environmental Engineering. After completing my graduate degree, I worked for an engineering consulting firm and worked for the North Carolina Department of Environmental Quality in its water quality programs. Since joining the Public Staff in January 2000, I have worked on utility cost recovery, renewable energy program management, customer complaints, and other aspects of utility regulation. I am a licensed Professional Engineer in North Carolina.

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1251

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Duke Energy Progress, LLC, for)
Approval of Renewable Energy and Energy)
Efficiency Portfolio Standard Cost Recovery) NOTICE OF AFFIDAVIT
Rider Pursuant to N.C.G.S. § 62-133.8 and)
Commission Rule R8-67)

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission,
by and through its Executive Director, Christopher J. Ayers, as constituted by
N.C. Gen. Stat. § 62-15, and gives notice that the Affidavit of:

June Chiu, Staff Accountant, Accounting Division
Public Staff - North Carolina Utilities Commission
430 North Salisbury Street - Dobbs Building
4326 Mail Service Center
Raleigh, North Carolina 27699-4300

will be used in evidence at the hearing in this docket scheduled for
September 15, 2020, pursuant to N.C. Gen. Stat. § 62-68. The affiant will not be
called to testify orally and will not be subject to cross-examination unless an
opposing party or the Commission demands the right of cross-examination by
notice mailed or delivered to the proponent at least five days prior to the hearing,
pursuant to N.C. Gen. Stat. § 62-68.

THEREFORE, the Public Staff moves that the Affidavit of June Chiu be
admitted into evidence in the absence of notice pursuant to N.C. Gen. Stat. § 62-68.

Respectfully submitted this the 25th day of August, 2020.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Gina C. Holt
Staff Attorney
gina.holt@psncuc.nc.gov

/s/ Nadia L. Luhr
Staff Attorney
nadia.luhr@psncuc.nc.gov

430 North Salisbury Street - Dobbs Building
4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110

CERTIFICATE OF SERVICE

I certify I have this day served a copy of the foregoing Notice of Affidavit and Affidavit on each of the parties of record in this proceeding or their attorneys of record by causing a copy to be deposited in the United States Mail, postage prepaid, properly addressed to each or by electronic delivery upon agreement from the parties.

This the 25th day of August, 2020.

Electronically submitted
/s/ Gina C. HOLT
Staff Attorney

DOCKET NO. E-2, SUB 1251

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Duke Energy Progress, LLC, for)
Approval of Renewable Energy and Energy) AFFIDAVIT
Efficiency Portfolio Standard Cost Recovery) OF
Rider Pursuant to N.C.G.S. 62-133.8 and) JUNE CHIU
Commission Rule R8-67)

STATE OF NORTH CAROLINA

COUNTY OF WAKE

I, June Chiu, first being duly sworn, do depose and say:

I am a Staff Accountant with the Accounting Division of the Public Staff - North Carolina Utilities Commission. A summary of my education and experience is attached to this affidavit as Appendix A.

N.C. Gen. Stat. § 62-133.8(h) provides that the State's electric power suppliers may recover their reasonable and prudently incurred incremental costs of compliance with the Renewable Energy and Energy Efficiency Portfolio Standard (REPS) through an annual rider charge. Pursuant to Commission Rule R8-67, the REPS rider will be recovered over the same period as the utility's fuel and fuel-related cost rider. Rule R8-67 also provides for a REPS experience modification factor (REPS EMF) rider, which is utilized to "true-up" the recovery of reasonable and prudently incurred incremental REPS compliance costs incurred during the test period established for each annual rider proceeding.

The purpose of my affidavit is to present the results of the Public Staff's investigation of the REPS EMF rider proposed by Duke Energy Progress, LLC (DEP or the Company), in this proceeding, based on incremental REPS compliance costs incurred and revenues recorded from April 2019 through March 2020 (REPS EMF period or test period).

On June 9, 2020, DEP filed its application, testimony, and exhibits related to the incremental costs incurred for compliance with the REPS. Williams Exhibit No. 4 sets forth the proposed annual and monthly EMF increment or decrement riders for each of the North Carolina retail customer classes. The proposed annual EMF increment/(decrement) riders, excluding the North Carolina regulatory fee, for the residential, general, and industrial customers, respectively, are \$0.01, \$(8.89), and \$(80.08) per retail customer account. These rates are calculated by dividing the "Total EMF Costs/(Credits)" amount, as shown on Williams Exhibit No. 4 for each customer class, by the "Total Projected Number of Accounts – DEP NC Retail" for that class. The proposed monthly EMF increment/(decrement) riders, excluding the regulatory fee, for residential, general, and industrial customers, respectively, are \$0.00, \$(0.74), and \$(6.67) per retail customer account.

The Public Staff's investigation included procedures intended to evaluate whether the Company properly determined its per books incremental compliance costs and revenues, as well as the annual revenue cap for REPS requirements, during the test period. These procedures included a review of the Company's filing and other Company data provided to the Public Staff. Additionally, the

procedures included a review of certain specific types of expenditures impacting the Company's costs, including labor and research and development costs. Performing the Public Staff's investigation required the review of numerous responses to written and verbal data requests.

As a result of the Public Staff's investigation, I am recommending that DEP's proposed annual and monthly REPS EMF increment or decrement riders for each customer class be approved. These amounts produce annual increment/(decrement) REPS EMF riders of \$0.01, \$(8.89), and \$(80.08), and monthly increment/(decrement) REPS EMF riders of \$0.00, \$(0.74), and \$(6.67), per customer account, excluding the regulatory fee, for residential, general, and industrial customers, respectively. Additionally, the Public Staff recommends that the Commission approve the same proposed REC sales price calculation, which was proposed by Duke Energy Carolinas, LLC (DEC), and the Public Staff in DEC's REPS rider proceeding in Docket No. E-7, Sub 1229 to calculate the sales price when the Company sells animal waste RECs to other electric suppliers to help those suppliers comply with N.C. Gen. Stat. §§ 62-133.8(e) and (f). The calculation, as described in Docket No. E-7, Sub 1229, includes (1) the calculation of the purchase price of the animal waste RECs, (2) the calculation of an overhead adder, and (3) the calculation of an interest adder. The proposed calculation (a) appropriately accounts for and balances the costs associated with the sales and (b) addresses the concerns raised by the Public Staff in the Docket No. E-7, Sub 1191 proceeding. The Public Staff recommends the calculation

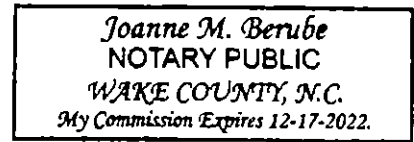
continue to be reviewed on an annual basis to verify that it is working as designed.

This completes my affidavit.

June Chiu

June Chiu

Sworn to and subscribed before me
this the 25th day of August, 2020.



Joanne M. Berube
Notary Public **JOANNE M. BERUBE**

My Commission Expires: 12/17/2022

QUALIFICATIONS AND EXPERIENCE

JUNE CHIU

I graduated from Drake University in 2008 with a Master degree in Business Administration. Prior to joining the Public Staff, I worked in state government in Iowa and for two Fortune 500 corporations. My duties varied from performing audit engagement to supervising accounting and internal controls and preparing SEC filings.

I joined the Public Staff in October 2017. I am responsible for (1) examining and analyzing testimony, exhibits, books and records, and other data presented by utilities and other parties under the jurisdiction of the Commission or involved in Commission proceedings, and (2) preparing and presenting testimony, exhibits, and other documents for presentation to the Commission.

I have performed audits and/or presented testimony and exhibits before the Commission for water cases for Ridgecrest, Water Resources, Aqua, Lake Junaluska, Carolina Water Service Inc. of NC and JAARS. I have participated in electric cases such as the Dominion Energy North Carolina 2019 rate case and Duke Energy Carolinas, LLC's 2019 rate case.