

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
)	MOTION BY CCEBA FOR LEAVE
2020 Biennial Integrated Resource Plans and)	TO PRESENT INFORMATION AT
Related 2020 REPS Compliance Plans)	TECHNICAL CONFERENCE ON
)	TOPIC TWO – ALL SOURCE
)	PROCUREMENT
)	
)	

NOW COMES the Carolinas Clean Energy Business Association (“CCEBA”) and respectfully requests that the North Carolina Utilities Commission (“Commission”) allow CCEBA to participate in the discussion of Issue Two (Allsource Procurement) identified in the Commission’s August 24, 2021 Order scheduling a Technical Conference to be held on September 30 and October 1, 2021 in this docket. In support of this motion, the Companies show the Commission as follows:

1. On August 24, 2021, the Commission entered its Order in this docket scheduling the Technical Conference. According to the Order, the purpose of the technical conference is for the Commission to be able to receive further information and ask questions of experts on three topics: (1) the methodology for evaluating economic retirement of coal-fired generating units; (2) “all-source” procurement processes; and (3) grid impacts of different portfolios. The Order further instructed that the Companies and intervenors will be allowed up to one hour to present on each topic, while the Public Staff and Attorney General will each be allowed a half hour to present on each topic.

2. CCEBA was specifically requested in the Order to participate in the discussion of Topics 1 and 3.

3. The Order required that “intervenors in this docket who are not identified in this Order as participants may petition the Commission for leave to participate in conference presentations not later than September 8, 2021.” CCEBA, having been identified as a participating Intervenor read this deadline to apply to Intervenor who had not been identified in the Order at all. CCEBA had planned to participate in Topic 2 and share time with other Intervenor.

4. After discussions with other stakeholders and out of an abundance of caution, CCEBA understands that its reading of the above portion from the Order may have been incorrect, and the Order would therefore have required CCEBA to move by September 8, 2021 for the right to participate in the discussion of Topic 2.

5. CCEBA believes that the perspective of independent power producers would be a valuable perspective for the Commission to consider on this issue.

6. CCEBA therefore moves the Commission to allow CCEBA to participate in the discussion of Topic 2 through the participation of Steven Levitas. Mr. Levitas is a Board Member of CCEBA and Senior Vice President of Regulatory and Government Affairs at Pine Gate Renewables. He co-chaired the Cooper Administration’s NERP Subcommittee on Competitive Procurement, has testified before the South Carolina Public Service Commission and provided comments to the Michigan Public Service Commission on competitive procurement program design, and has been involved in competitive procurement policy development in North Carolina and at the federal level. He will provide CCEBA’s perspective on key considerations in the design of all-source procurement

programs. CCEBA anticipates no more than a half hour or presentation from Mr. Levitas, and will work with other Intervenors to fit his presentation into the time allotted under the Order.

7. CCEBA has consulted with counsel for the Attorney General's Office, the Public Staff, and the Duke Companies, as well as Intervenors North Carolina Sustainable Energy Association, National Resources Defense Council, the Southern Alliance for Clean Energy, the Sierra Club and NC WARN. All counsel indicated they have no objection to this motion.

WHEREFORE, CCEBA respectfully requests that the Commission grant this motion to allow CCEBA to participate in the discussion of Topic 2 (All Source Procurement) through the participation of Mr. Steven Levitas, and grant such further relief as the Commission deems just and proper.

This the 17th day of September, 2021.

/s/ John D. Burns
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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing filing by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 17th day of September 2021.

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