

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 931
DOCKET NO. E-7, SUB 1032

DOCKET NO. E-2, SUB 931)	
)	
In the Matter of:)	
Application of Duke Energy)	JOINT MOTION TO ALLOW REMOTE PARTICIPATION IN TECHNICAL CONFERENCE
Progress, LLC, for Approval of)	
Demand-Side Management and)	
Energy Efficiency Cost Recovery)	
Rider Pursuant to N.C. Gen. Stat. §)	
62-133.9 and Commission Rule)	
R8-69)	
)	
DOCKET NO. E-7, SUB 1032)	
)	
In the Matter of:)	
Application of Duke Energy)	
Carolinas, LLC, for Approval of)	
New Cost Recovery Mechanism)	
and Portfolio of Demand-Side)	
Management and Energy Efficiency)	
Programs)	

The Southern Alliance for Clean Energy (SACE), Natural Resources Defense Council (NRDC), South Carolina Coastal Conservation League (CCL), Sierra Club, North Carolina Justice Center (NC Justice Center), and North Carolina Housing Coalition (NCHC), jointly with the North Carolina Sustainable Energy Association (NCSEA) (collectively, Efficiency Advocates), respectfully submit this joint motion to allow remote participation in the technical conference scheduled for the above-captioned matters on April 22, 2024. In support of their motion, Efficiency Advocates show the following:

1. On December 18, 2023, the Commission held a technical conference, receiving presentations from the parties on the existing Mechanisms and on the work of the DSM/EE Mechanism Review stakeholder process.

2. Initial comments on the Mechanisms were filed on January 26, 2024, by Duke; Public Staff; Efficiency Advocates, the North Carolina Attorney General's Office (AGO); the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together with CIGFUR II, CIGFUR); Walmart Inc. (Walmart); and Carolina Utility Customers Association, Inc. (CUCA).

3. On April 1, 2024, Duke and the Public Staff filed reply comments. Duke indicated in its cover letter that it had reached consensus with the Efficiency Advocates, who supported the reply comments submitted by Duke.

4. In its April 5, 2024 Order, the Presiding Commissioner found that that a technical conference would assist the Commission in efficiently and expeditiously assessing the impacts of the new Proposed Mechanisms and in examining the remaining contested issues before ruling on the Proposed Mechanisms. The Technical Conference was scheduled for the afternoon of April 22, the date previously set aside for potential oral arguments in these dockets.

5. After learning of the Commission's decision to conduct a Technical Conference, undersigned counsel conferred with colleagues and began the process of identifying an appropriate technical expert on Active Load Management. Because this issue is one of the only remaining contested issues under consideration in the DSM/EE Mechanism review, and it is one that Efficiency

Advocates initially advanced, we are committed to identifying and presenting a technical expert who could participate in the Technical Conference and answer any questions from the Commission. We are not aware of an independent subject matter expert on this topic in North Carolina.

6. Undersigned counsel first reached out to experts at Rocky Mountain Institute (RMI) on April 4 to determine whether any of their in-house subject matter experts would be available to participate in-person at the April 22 Technical Conference. We learned on April 5 that RMI was interested and would work to identify someone with both the relevant expertise and availability to come to North Carolina to participate in the Technical Conference.

7. After following up with RMI, we learned late in the afternoon on April 9 that RMI's in-house experts on topics relating to Active Load Management and virtual power plants were already committed to other projects over the next couple of weeks and would not be in a position to prepare for or attend the April 22 Technical Conference.

8. On the morning of April 10, undersigned counsel reached out to the lead authors of the Brattle report that we referenced in our initial comments. See Ryan Hledik & Kate Peters, Real Reliability: the Value of Virtual Power, Brattle (May 2023)

(https://www.brattle.com/wp-content/uploads/2023/04/Real-Reliability-The-Value-of-Virtual-Power_5.3.2023.pdf). We received an out-of-office notification for Kate Peters but received a response from Ryan Hledik, principal at the Brattle Group, who is willing to participate in the Technical Conference, but has preexisting travel

plans on April 21 that would make getting to North Carolina on April 22 impossible. Ryan Hledik's bio is attached to this motion.

9. We respectfully ask the Commission to allow remote participation by Ryan Hledik in this Technical Conference. We recognize that the Commission has disfavored remote participation in hearings since COVID restrictions have been lifted, but the unique circumstances presented in this Docket merit an exception to that general policy. Unlike most evidentiary hearings, there was relatively little time to secure an advanced commitment for in-person participation by a subject matter expert. In addition, unlike an evidentiary hearing, the Commission will be hearing unsworn testimony in a less formal setting.

10. The undersigned has conferred with all parties, including Duke, Public Staff, AGO, CIFUR, CUCA, and Walmart, and no party objects to the relief requested in this motion.

Respectfully submitted this the 11th day of April, 2024.

/s/ David L. Neal

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CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Motion on behalf of Southern Alliance for Clean Energy, Natural Resources Defense Council, Southern Alliance for Clean Energy, Sierra Club, North Carolina Justice Center, North Carolina Housing Coalition, and North Carolina Sustainable Energy Association either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 11th day of April, 2024.

/s/ David L. Neal

David L. Neal

Ryan Hledik - Brattle

 brattle.com/experts/ryan-hledik/

[Home](#)[Experts](#)Ryan Hledik



Mr. Hledik specializes in regulatory and planning matters related to the emergence of distributed energy technologies.

Mr. Hledik has consulted for more than 80 clients across 35 states and nine countries. He has supported clients in matters related to energy storage, load flexibility, distributed generation, electrification, retail tariff design, energy efficiency, and grid modernization.

Mr. Hledik's work has been cited in regulatory decisions establishing procurement targets for energy storage and demand response, authorizing billions of dollars in smart metering investments, and approving the introduction of innovative rate designs. He is a recognized voice in debates on how to price electricity for customers with distributed generation. He coauthored Saudi Arabia's first Demand Side Management (DSM) plan, and the Federal Energy Regulatory Commission's landmark study, *A National Assessment of Demand Response Potential*.

Mr. Hledik has published more than 25 articles on retail electricity issues and has presented at industry events throughout the United States as well as in Brazil, Belgium, Canada, Germany, Poland, South Korea, Saudi Arabia, the United Kingdom, and Vietnam. His research on the "grid edge" has been cited by *Forbes*, *National Geographic*, *The New York Times*, and *The Washington Post*, and in trade press such as *GreenTech Media*, *Utility Dive*, and *Vox*. He was named to *Public Utilities Fortnightly's* Under Forty 2019 list recognizing rising stars in the industry.

Mr. Hledik received his MS in Management Science and Engineering from Stanford University, where he concentrated in Energy Economics and Policy. He received his BS in Applied Science from the University of Pennsylvania, with minors in Economics and Mathematics. Prior to joining Brattle, Mr. Hledik was a Research Assistant with Stanford University's Energy Modeling Forum and a Research Analyst at Charles River Associates.

Practices

Regulatory Economics, Finance & Rates



Electricity Wholesale Markets & Planning



Education

Stanford University

MS in Management Science and Engineering

University of Pennsylvania

BS in Applied Science



Real Reliability: The Value of Virtual Power

In the past decade, the US has spent over \$120 billion on 100 GW of new generation capacity, with the primary purpose of providing resource adequacy. However, more will be needed, particularly due to decarbonization initiatives that will enable electrification and retire fossil fuel-based generation. In this study, we explore the cost and ability to serve critical resource adequacy needs from an emerging resource: virtual power plants (VPPs).

[Learn More](#)

Personal Interests

An Oregon native, Ryan is a fan of the Portland Trailblazers, good coffee, and country music. He enjoys cycling, yoga, running, basketball, tennis, and cross-country skiing.

Ryan lives in San Francisco with his wife Jenny and sons Weston and Miles.

Testimony

August 22, 2013

Affidavit of Ahmad Faruqui and Ryan Hledik on Behalf of Converge, Regarding PJM's Proposed Tariff Revisions Regarding Demand Response Capacity Market Participation Requirements. Before the Federal Energy Regulatory Commission. Docket No. ER13-2108-000

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