



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

June 30, 2021

Ms. A. Shonta Dunston, Interim Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4000

Re: Docket Nos. E-2, Sub 1159 and E-7, Sub 1156, In the Matter of Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, for Approval of Competitive Procurement of Renewable Energy Program

Dear Ms. Dunston:

On June 2, 2021, the Commission issued an *Order Requesting Update* (Order) in the above-captioned dockets, on the Duke Energy Carolinas, LLC's (DEC) and Duke Energy Progress, LLC's (DEP) (collectively, Duke) joint Competitive Procurement of Renewable Energy (CPRE) Program Plan Update, filed September 1, 2020, in Docket No. E-100, Sub 165 (September 1, 2020 Update) and the DEC 2020 Compliance Report filed Docket No. E-7, Sub 1247 (DEC 2020 Compliance Report) requesting an update from the parties on the following issues: (1) the most current status of the Transition MW, (2) the need for and appropriate timing of a CPRE Tranche 3, and (3) the parties' positions on statutory interpretation regarding what must be completed within the 45-month term and what actions the Commission may properly take beyond the 45-month timeframe to ensure that the final procurement target is met.

On June 15, 2021, the Public Staff, Duke, and the Carolinas Clean Energy Business Alliance (CCEBA) filed initial comments in response to the Order. In lieu of reply comments, the Public Staff submits this letter. The Public Staff has reviewed the initial comments of Duke and CCEBA, and continues to recommend that Commission require Duke to file a new CPRE Program Plan that includes an additional tranche of the CPRE after the initial CPRE Program Procurement Period for any unawarded capacity needed to meet the initial procurement target (Additional MWs) and a portion of the renewable energy capacity identified as needed pursuant to the 2020 Integrated Resource Plan (IRP). With respect to timing, the Public Staff continues to believe that a

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Tranche 3, including the Additional MWs plus capacity determined to be appropriate consistent with the needs identified in the IRP, may occur outside the 45-month timeframe established by House Bill 589. The Public Staff notes that the Commission recently issued an Order in the IRP Docket on June 29, 2021, Docket No. E-100, Sub 165, waiving DEC's and DEP's obligation to file 2021 Updated IRPs but continuing to require the Companies to file their CPRE Program Plan updates as required by Commission Rule R8-71(g)(1) by September 1 of this year. The Public Staff believes that this would be an appropriate time for Duke to file its proposed plans for the CPRE Program Plan going forward. At the time Duke makes this filing, the Public Staff recommends that the Commission solicit comments from the parties regarding the capacity and timing of a potential Tranche 3.

Sincerely yours,

/s/ Layla Cummings
Staff Attorney
layla.cummings@psncuc.nc.gov

cc: Parties of Record