

**STATE OF NORTH CAROLINA UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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|---------------------------------------|---|------------------------|
| In the Matter of |) | MOTION BY CAROLINAS |
| Petition for Approval of Revisions to |) | CLEAN ENERGY BUSINESS |
| Generator Interconnection Standards |) | ASSOCIATION FOR LEAVE |
| |) | TO FILE SUPPLEMENTAL |
| |) | COMMENTS REGARDING |
| |) | DUKE ENERGY'S PETITION |
| |) | FOR APPROVAL OF |
| |) | LIMITED MODIFICATIONS |
| |) | TO NORTH CAROLINA |
| |) | INTERCONNECTION |
| |) | PROCEDURES |

NOW COMES the Carolinas Clean Energy Business Association (“CCEBA”) and hereby respectfully requests that the North Carolina Utilities Commission (the “Commission”) grant it leave to file supplemental comments in the above captioned proceeding. CCEBA’s proposed comments, included as an attachment hereto: (1) describe and explain (in the context of the interconnection docket) the Petition filed by CCEBA contemporaneously with this motion in Commission Docket Nos. E-2, Sub 1159 and E-7, Sub 1156, requesting the initiation of a Resource Solicitation Cluster for Tranche 3 of the Competitive Procurement of Renewable Energy (“CPRE”) program; and (2) in light of such Petition, provide supplemental comments in response to the reply comments filed by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”, together with DEP the “Companies” or “Duke”) and Public Staff – North Carolina Utilities Commission (“Public Staff”) on September 22, 2021. In support thereof, CCEBA shows the following:

1. On August 17, 2021 Duke filed a Petition for Approval of Limited Modifications to the North Carolina Interconnection Procedures to Expand Transitional Cluster Study Eligibility (the “Petition for Modification”).

2. On August 30, 2021 the Commission issued an Order Requesting Comments on Petition setting forth a deadline of September 8, 2021 for comments by parties on the Petition for Modification.

3. On September 8, 2021 CCEBA filed Comments in Response to the Petition for Modifications. The Public Staff also filed a Letter in Lieu of Comments on September 8, 2021.

4. On September 9, 2021 the Commission issued an Order Requesting Reply Comments setting forth a deadline of September 16, 2021 for Reply Comments on CCEBA’s September 8, 2021 comments.

5. On September 15, 2021 Duke filed a Motion for Extension of Time to file reply comments, and on September 17, 2021 the Commission granted Duke’s motion and set forth a deadline of September 22, 2021 for reply comments.

6. On September 22, 2021 Duke and the Public Staff each filed reply comments in response to the September 8, 2021 comments of CCEBA.

7. In the Petition for Modification, Duke requested limited modifications to the North Carolina Interconnection Procedures (“NCIP”) in order to facilitate the alignment of the Transitional Cluster Study process with the implementation of a Tranche 3 under the CPRE program. Since the filing of the Petition for Modification, Duke has held two CPRE Tranche 3 stakeholder meetings on September 17, 2021 and September 24, 2021 to further

discuss the possibility of including Tranche 3 as part of the Transitional Cluster Study. Alternative procedural paths were also discussed by stakeholders during these meetings.

8. Duke, the Public Staff, and CCEBA have engaged in discussions regarding the process and mechanics of aligning Tranche 3 with the Transitional Cluster Study process and, alternatively, of holding a Resource Solicitation Cluster for Tranche 3.

9. Based on these ongoing discussions and the positions of the parties, CCEBA considers it necessary to file supplemental comments responsive to the comments filed by Duke and the Public Staff on September 22, 2021 and in order to describe and explain the Petition being filed by CCEBA contemporaneously in the Commission's CPRE dockets, E-7, Sub 1156 and E-2, Sub 1159 requesting that the Commission establish a Resource Solicitation Cluster for Tranche 3.

10. CCEBA's supplemental comments will assist the Commission in its determination of the appropriate procedural pathway for Duke to move forward with Tranche 3 given the complex interaction of queue reform implementation and completion of the initial CPRE program as required by N.C.G.S. § 62-110.8.

WHEREFORE, for the reasons set forth herein, CCEBA respectfully requests that the Commission grant its motion and allow it to file supplemental comments.

Respectfully submitted, this 5th day of October, 2021.

/s/ John D. Burns
John D. Burns
General Counsel for CCEBA
N.C. State Bar No. 24152
811 Ninth Street, Ste. 120-158
Durham, NC 27705
919-306-6906
counsel@CarolinasCEBA.com

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 5th day of October, 2021.

/s/ John D. Burns
John D. Burns
General Counsel for CCEBA
N.C. State Bar No. 24152
811 Ninth Street, Ste. 120-158
Durham, NC 27705
919-306-6906
counsel@CarolinasCEBA.com