

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 137

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	NC WARN'S MOTION FOR
Investigation of the Integrated Resource)	LEAVE TO FILE
Plans in North Carolina for 2013)	ADDITIONAL COMMENT

NOW COMES NC WARN, through the undersigned attorney, with a motion for leave to file an additional and clarifying comment in response to the comments filed by Duke Energy on its integrated resource plans ("IRPs"). In support of its motion is the following:

1. In its Reply Comments filed May 23, 2014, pages 10 - 11, Duke Energy aggressively replied to NC WARN's comments by stating

NC WARN insinuates that Duke Energy filed one set of load forecasts with this Commission, yet told other audiences that the true load forecast is much lower. It is disturbing that NC WARN apparently fails to understand (or wilfully ignores) that Duke Energy operates utilities in six (6) states, *and that the referenced Duke Energy executives were not speaking about the DEC and DEP 2013 load forecasts in their comments.*

(emphasis in original). This ignores NC WARN's paragraph 8, footnote 8, which clearly contradicts Duke Energy's comment that the much lower forecasts by Duke Energy officials do not conflict with the IRPs filed in this docket, as they were addressing the entire Duke Energy system, and not just North Carolina.

Footnote 8 reads:

One rationale given by Duke Energy officials and floated to business reporters for the considerably lower forecasts is that they are for the Duke Energy system in its entirety. This falls flat after

reviewing the IRPs (or similar documents) in each of the other states Duke Energy serves – the weighted average is a forecasted 1.33% growth rate, with only Indiana projected as significantly lower than other states. The other rationale given for the lower growth forecasts is they do not include growth in sales to wholesale customers. This also falls flat in that there just are not many potential wholesale customers in the North Carolina service area left, and their growth will not be any higher than the rest of the system.

2. The worksheet showing the weighted average of growth rates in the various states Duke Energy has service areas is attached. The growth rates reported in the most recent IRPs (or equivalent planning documents) were reviewed in each of the states from utility commission websites. The number of customers came directly from the Duke Energy website to provide a weighted average of a forecast of 1.33% for the entire Duke Energy service. A fundamental assumption was that the mix of customer classes was approximate similar in each of the states as classification of customer classes varied.

3. The weighted average of 1.33% was still considerable higher than the 0.5 to 1.0% range given by Ms. Good in her earnings conference call with Duke Energy shareholders on November 6, 2013, and the 0.5 and 0.9% given by Mr. Newton in January to a legislative committee in which he discussed Duke Energy in North Carolina. Given the disparity between the comments by the Duke Energy officials, some of which were under oath to regulatory commissions, NC WARN stands by its comments that the Commission should investigate why differing forecasts were used in different forums, and what forecast Duke Energy is actually using for planning purposes.

4. Whether these discrepancies were intentional or inadvertent, the difference between a forecast in the 1.33 to 1.5% range and the considerably lower forecasts by Ms. Good and Mr. Newton, and especially that of Mr. Rogers, results in billions of dollars of new plant construction.

THEREFORE, NC WARN prays that the Commission reviews its additional comment.

Respectfully submitted, this is the 11th day of April 2014.

FOR NC WARN

/s/ John D. Runkle

John D. Runkle
Attorney at Law
2121 Damascus Church Rd.
Chapel Hill, N.C. 27516
919-942-0600 (o)
jrunkle@pricecreek.com

NC WARN WORKSHEET on load growth forecasts**Average annual net energy for load growth estimated in most recent documents publically available:**

Duke Energy Indiana = 0.6%
 Duke Energy Florida = 1.5%
 Duke Energy Ohio/Kentucky = 1.1%
 Duke Energy Carolinas = 1.5%
 Duke Energy Progress = 1.4%

Unweighted average annual net energy for load growth (if all states were same size) = 1.22%

Number of customers in each service area:

Duke Energy Indiana = 790,000
 Duke Energy Florida = 1.7 million
 Duke Energy Ohio/Kentucky = 830,000
 Duke Energy Carolinas = 2.4 million
 Duke Energy Progress = 1.5 million
 Total = 7,220,000

Weighted average annual net energy for load growth = 1.33%

Duke Energy Indiana = 474,000
 Duke Energy Florida = 2.55 million
 Duke Energy Ohio/Kentucky = 913,000
 Duke Energy Carolinas = 3.6 million
 Duke Energy Progress = 2.1 million
 Total = 9,637,000

Assumption: Customer classification mix approximately similar in various states.

Sources:

http://www.duke-energy.com/pdfs/Indiana_Public_IRP.PDF

<https://www.frcc.com/Planning/Shared%20Documents/FRCC%20Presentations%20and%20Utility%202010-Year%20Site%20Plans/2013%20TYSPs/2013%20PEF%20TYSP.pdf>

<http://www.pjm.com/~media/documents/reports/2013-load-forecast-report.ashx>

Duke Energy Carolinas 2013 IRP, NCUC Docket E-100 Sub 137

Duke Energy Progress 2013 IRP, NCUC Docket E-100 Sub 137

<http://www.duke-energy.com/pdfs/de-factsheet.pdf>