

May 20, 2024

*Via Electronic Filing*

Ms. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**Re: *Partial Proposed Order of Southern Alliance for Clean Energy  
2023 Biennial Avoided Cost Proceeding  
Docket No. E-100, Sub 194***

Dear Chair Mitchell and Commission Members:

Enclosed for filing is the Partial Proposed Order of the Southern Alliance for Clean Energy (SACE) for the above-captioned proceeding. SACE's Partial Proposed Order addresses the Net Excess Energy Credit (NEEC) that customers receive for net excess energy exported to the grid above and beyond the customer's consumption within a given pricing period.

Counsel for SACE had the opportunity to review the near-final draft partial proposed orders of the North Carolina Sustainable Energy Association (NCSEA) and the Carolinas Clean Energy Business Association (CCEBA). Consistent with SACE's Reply Comments, SACE supports and endorses the portions of NCSEA's Partial Proposed Order addressing the Energy Storage System (ESS) retrofit standard rate, and CCEBA's Partial Proposed Order requiring a stakeholder process—to be overseen by an independent third party—to evaluate alternative methodologies. Please do not construe SACE's lack of explicit endorsement of the remainder of NCSEA's partial proposed order as opposition; the press of business prevented further coordination.

Thank you. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

/s/ Nicholas Jimenez

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Cc: All parties of record