



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

September 8, 2017

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. E-100, Sub 150

Dear Ms. Jarvis:

The Public Staff has participated in discussions with counsel from Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, Duke) and separately with the North Carolina Sustainable Energy Association (NCSEA) and the North Carolina Clean Energy Business Alliance (NC CEBA) regarding the initial comments filed by the parties and the draft proposed rule filed by Duke on August 16, 2017, in this proceeding. The Public Staff has also reviewed the proposed CPRE Program Rule that Duke intends to file on September 8, 2017, and generally agrees with the revised Rule, as drafted. The Public Staff does, however, wish to continue discussions with Duke and other parties regarding the consideration of pricing or cost information included with utility self-build proposals in Rule R8-xx(f)(2)(iv.), as well as regarding the treatment of selected projects at the expiration of the initial contract term or the expiration of the term of the market-based cost recovery mechanism, as discussed in proposed Rule R8- xx(m)(4).

The Public Staff believes that the current procedural schedule described in Ordering Paragraph No. 5 in the Commission's July 28, 2017, *Order Initiating Rulemaking Proceeding in Docket No. E-100, Sub 150* provides a sufficient

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opportunity for parties to conduct these discussions and provide comments following the Commission's issuance of a draft proposed rule.

By copy of this letter, I am serving all parties of record.

Sincerely,

/s/ Tim R. Dodge
Staff Attorney
tim.dodge@psncuc.nc.gov