



Jack E. Jirak
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September 5, 2018

VIA Electronic Filing

Ms. M. Lynn Jarvis, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

**Re: Docket No. E-7, Sub 1169
Docket No. E-2, Sub 1170
Wells Fargo Bank, NA Consumer Statement of Position**

Dear Ms. Jarvis:

Please find enclosed for filing in the above-captioned dockets a letter from Wells Fargo Bank, NA ("Wells Fargo") to the North Carolina Utilities Commission ("Commission") regarding Wells Fargo's interest in participating in the Green Source Advantage Program.

Wells Fargo has authorized Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to file this letter with the Commission on Wells Fargo's behalf as a consumer statement of position.

Please feel free to contact me with any questions. Thank you for your assistance in this matter.

Very truly yours,

Jack E. Jirak

Enclosure

cc: Parties of Record

OFFICIAL COPY

Sep 05 2018



Corporate Properties Group
11625 N Community House Road
2nd Floor, D1185-020
Charlotte, NC 28277

wellsfargo.com

OFFICIAL COPY

Sep 05 2018

September 4, 2018

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, North Carolina 27603

Re: Petition of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC, Requesting Approval of Green Source Advantage Program and Rider GSA to Implement G.S. 62-159.2;
Docket Nos. E-2, Sub 1170 and E-7, Sub 1169

Dear Ms. Jarvis:

Please note that Wells Fargo Bank, NA is generally supportive of the GSA program proposed by the Duke Companies under this docket. We may register to participate under one of the options offered by the Duke Companies.

We support three proposals that have been introduced for calculating the GSA Bill Credit under the Self-Supply option of the GSA program:

- The first is the proposed GSA Bill Credit based on the administratively-determined 5-year forecasted avoided cost outlined in the Reply Comments of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (filed on April 20th, 2018), although support is contingent upon how this calculation is performed. We support the position that the details behind the forecasted calculation should be transparent and made available to prospective GSA customers.
- We support an approach for the GSA Bill Credit that is calculated on an hourly, day-ahead projection on a daily basis and includes capacity revenue via a rationing charge, similar to that described in the Agreement and Stipulation of Partial Settlement between the Duke Companies, Wal-Mart Stores East, LP and Sam's East Inc. (filed on August 16th, 2018) (the "Settlement").
- We also support the GSA customer negotiating a levelized \$/MWh price with the third-party renewable developer that becomes the GSA Product Charge and the GSA customer being permitted to allocate the total capacity (and the associated GSA Product Charge and Bill Credit) between various of the GSA customer's accounts.

Please contact us if you have any questions concerning this letter.

Sincerely,

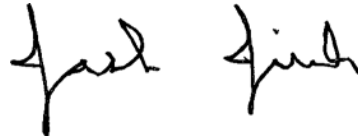
Curt Radkin
Sr Vice President



CERTIFICATE OF SERVICE

I certify that a copy of Wells Fargo Bank, NA's Consumer Statement of Position, in Docket Nos. E-7, Sub 1169 and E-2, Sub 1170, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid, properly addressed to parties of record.

This the 5th day of September, 2018.

A handwritten signature in black ink, appearing to read "Jack Jirak", written in a cursive style.

Jack E. Jirak
Associate General Counsel
Duke Energy Corporation
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Raleigh, NC 27602
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