JOSH STEIN
ATTORNEY GENERAL

STATE OF NORTH CAROLINA
DEPARTMENT OF JUSTICE
PO BOX 629
RALEIGH, NORTH CAROLINA 27602

REPLY TO:
DIAL: (919) 716-6000
FAX: (919) 716-6050

September 8, 2022

Shonta Dunston, Chief Clerk
The North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-432

Re: Docket No. E-100, Sub 179

Honorable Clerk and Commissioners:

On September 2, 2022, the North Carolina Attorney General's Office (AGO) filed in the above-referenced docket the direct testimony of Edward Burgess. After careful review, the AGO and Mr. Burgess have identified technical errors in his testimony that need to be corrected. Specifically, the technical errors were found in Exhibit 2 to Mr. Burgess' testimony. Attached is a redlined version of that exhibit as well as the corrected version.

These corrections do not alter or change the arguments or recommendations made in Mr. Burgess' testimony. The AGO apologizes for any inconvenience that may have been caused by these errors. Please do not hesitate to contact me with any questions.

By copy of this letter, I am forwarding a copy of the revised Exhibit 2 to all parties of record.

Sincerely,

Electronically submitted
/s/Tirrill Moore
Assistant Attorney General
temoore@ncdoj.gov

Exhibit 2: AGO Supplemental Portfolio Modeling Results

The following exhibit provides a summary of the results from the SP-AGO Supplemental Portfolio. These results were derived from the EnCompass model run performed by Strategen for the AGO and described in the AGO's testimony. Post processing was conducted in the same manner as other portfolios analyzed in this proceeding.

I. Summary of Key Resource Additions and Retirements in SP-AGO and P1 Portfolios[1]

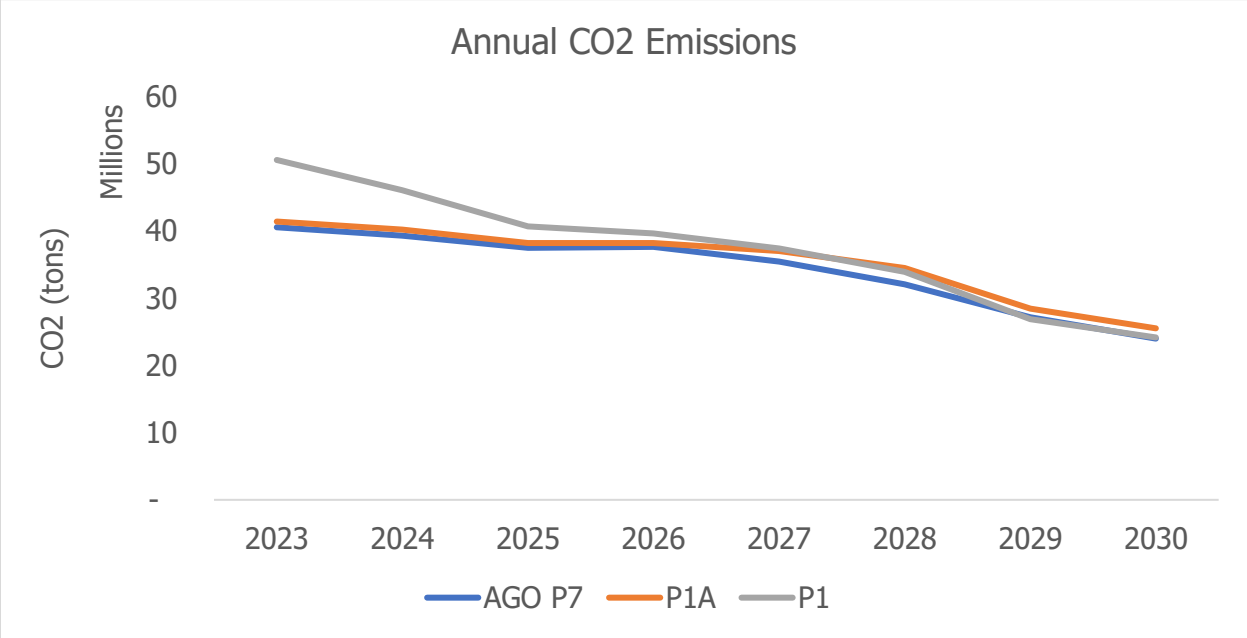
Carbon Plan Portfolios	**P1**		**SP-AGO**	
	Resources (MW) Start of Year (2030 | 2035)			
Total System Solar	12,307	18,829	12,445	16,264~~17,427~~ 24,109
Incremental System Solar (excludes projects in development)	5,400	11,850	6,126	9,945~~10,740~~ 17,580
Incremental Onshore Wind (incl. imports)	600	1,200	~~3,000~~2,250	3,600
Incremental Offshore Wind	800	800	800	800
Incremental SMR Capacity	0	570	0	~~855~~570
Incremental Energy Storage	2,067	5,671	3,490[2]	6,800
Incremental Gas (CC)	2,430	2,430	0	0
Incremental Gas (CT)	1,128	1,128	462	462
Incremental Coal to Gas Conversion	849	849	1959	1959
Early Coal Retirements	*Subcritical by 2030; MSS 3&4 in 2032*		*Subcritical by 2030 except Rox 3&4 in 2033; MSS 3&4 in 2032; Belews Creek conversion by 2028*	
Total Coal Retirements [MW] by End of 2035	8,445		9,294	

II. HB 951 Compliance and Cost for all Duke-modeled Portfolios and SP-AGO

Portfolio	**Year in which 70% NC CO_2 Reduction Achieved (2030 compliant portfolios in bold)**	**Present Value Revenue Requirement (PVRR) through 2050 (DEP/DEC Combined System) [$B]**
P1	**2030**	**$101**
P2	2032	$99
P3	2034	$95
P4	2034	$96
$P1_A$	**2030**	**$104**
$P2_A$	2032	$101
$P3_A$	2034	$99
$P4_A$	2034	$99
SP5	2032	$102
SP6	2034	$98
$SP5_A$	2032	$98
$SP6_A$	2034	$95
SP-AGO	**2030**	**$100**

[1] Derived from Duke Energy Carbon Plan, Chapter 3, Table 3-3.
[2] Includes both standalone storage and pumped hydro.

III. Emissions Performance Of All 2030-Compliant Portfolios



IV. SP-AGO, Cumulative Resource Additions by Year

SP-AGO, Cummulative MW Additions	2023-2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
CT J	-	-	-	462	462	462	462	462	462	462	462
CT J H2	-	-	-	-	-	-	-	-	-	-	-
2x1 CCJ	-	-	-	-	-	-	-	-	-	-	-
2x1 CCF	-	-	-	-	-	-	-	-	-	-	-
SMR	-	-	-	-	-	-	-	285	285	570	855
Advanced Reactor w/ Storage	-	-	-	-	-	-	-	-	-	-	-
Onshore Wind	-	-	750	1,500	2,250	3,000	3,450	3,600	3,600	3,600	3,600
Offshore Wind (2029)	-	-	-	-	800	800	800	800	800	800	800
Standalone Solar	1,418	1,787	1,856	1,925	1,994	2,063	2,063	2,063	2,063	2,063	2,063
S+S 25% Battery Ratio, 4hrs	-	675	1,950	2,400	2,400	2,400	3,375	3,825	4,050	4,425	5,400
S+S 50% Battery Ratio, 2hrs	-	-	-	600	600	600	600	600	750	750	750
S+S 50% Battery Ratio, 4hrs	-	-	-	750	2,550	3,525	3,825	3,825	3,825	4,125	4,650
4-hr Battery	297	297	297	947	947	947	997	997	997	1,097	1,097
6-hr Battery	-	-	-	-	-	-	-	-	-	-	-
8-hr Battery	-	-	-	-	-	-	-	-	-	-	-
Bad Creek II	-	-	-	-	-	-	-	1,680	1,680	1,680	1,680

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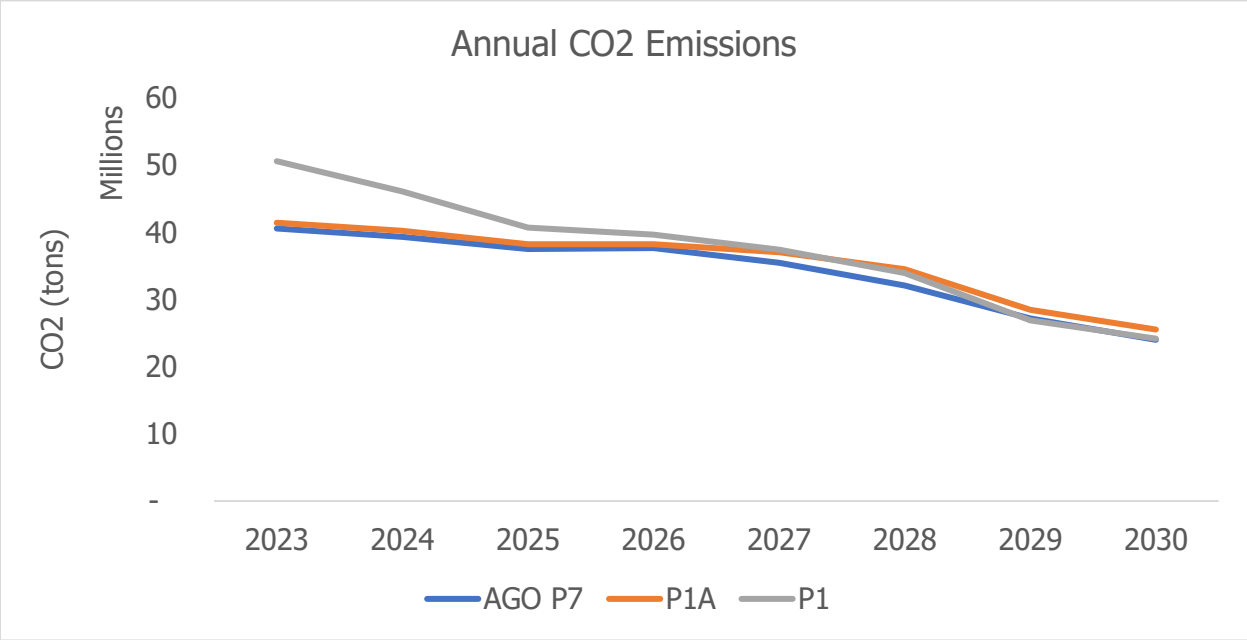

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4-hr Battery	297	297	297	947	947	947	997	997	997	1,097	1,097
6-hr Battery	-	-	-	-	-	-	-	-	-	-	-
8-hr Battery	-	-	-	-	-	-	-	-	-	-	-
Bad Creek II	-	-	-	-	-	-	-	1,680	1,680	1,680	1,680