

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NOS. E-2, SUB 1167; E-7, SUB 1166

In the Matter of:)	
)	
Application of Duke Energy Progress,)	INITIAL COMMENTS OF
LLC, and Duke Energy Carolinas,)	SOUTHERN ALLIANCE FOR
LLC, Requesting Approval of Solar)	CLEAN ENERGY ON INCENTIVE
Rebate Program Pursuant to G.S. 62-)	AMOUNTS
155(f))	
)	

Pursuant to the North Carolina Utilities Commission’s (“Commission”) November 6, 2020 *Order Modifying Fourth Year of Solar Rebate Program and Requesting Additional Comments* (“November 6 Order”) and November 23, 2020 *Order Granting Motion for Extension of Time to File Comments* in the above-referenced dockets, the Southern Alliance for Clean Energy (“SACE”) respectfully submits the following initial comments.

In its November 6 Order, the Commission expressed an interest in the viability of a tiered incentive system under which the incentive amount would decline as the system size approached the maximum. The Commission stated that this structure could benefit customers with greater budget constraints, who might be installing smaller systems, and would recognize that the cost per watt decreases as system size increases.

SACE shares the Commission’s interest in ensuring that the rebate system serves the broadest set of customers possible by making access to clean energy more affordable. SACE also is interested in exploring whether a tiered system would serve this goal, among other options. However, SACE does not have sufficient information at this point to determine whether it would be the best solution to pursue.

SACE looks forward to reviewing the information that the Commission has required Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC to submit in their initial comments, as well as the initial comments of other parties, and anticipates filing reply comments.

Respectfully submitted this the 3rd day of December, 2020.

s/Nick Jimenez

Nicholas Jimenez

N.C. Bar No. 53708

Southern Environmental Law Center

601 West Rosemary Street, Suite 220

Chapel Hill, NC 27516

Telephone: (919) 967-1450

Fax: (919) 929-9421

njimenez@selcnc.org

Attorney for Southern Alliance for Clean Energy

CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing reply comments either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 3rd day of December, 2020.

s/Nicholas Jimenez