



**NORTH CAROLINA  
PUBLIC STAFF  
UTILITIES COMMISSION**

September 16, 2020

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

Re: Docket No. E-100, Sub 158 - Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2018

Dear Ms. Campbell:

On April 15, 2020, the Commission issued an *Order Establishing Standard Rates and Contract Terms for Qualifying Facilities* in this 2018 biennial avoided cost proceeding requiring Duke Energy Carolinas, LLC (DEC), and Duke Energy Progress, LLC (DEP; together with DEC, Duke), to organize a virtual stakeholder process to address the addition of storage at existing qualifying facilities and to report the results of the stakeholder process to the Commission through an appropriate filing in this docket on or before September 1, 2020.

The Order further required that to the extent the Public Staff does not agree with any of the recommendations in the report, the Public Staff shall file a separate report setting forth its recommendation(s) and basis therefor on September 1, 2020.

On August 28, 2020, Duke and Dominion Energy North Carolina (together, the Utilities) filed a joint motion requesting an extension of time until September 16, 2020 and also the same extension for the Public Staff to file its separate report and recommendations, if necessary. On August 31, 2020, the Commission granted the Utilities' request for an extension.

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The Public Staff participated in the virtual stakeholder process and reviewed the Utilities' report to be filed today. The Public Staff believes the report accurately summarizes the stakeholder process, sets forth areas of consensus among the parties, and in those areas where consensus was not reached, presents recommendations for the Commission's consideration. The Public Staff generally agrees with the recommendations in the Utilities' report and, therefore, does not plan to file a separate report in this docket. The Public Staff further notes that several issues, including the regarding the ability of QFs to provide system ancillary services, will likely be discussed further in the 2020 avoided cost proceeding in Docket No. E-100, Sub 167.

Sincerely,

/s/ Layla Cummings  
Staff Attorney  
[layla.cummings@psncuc.nc.gov](mailto:layla.cummings@psncuc.nc.gov)