



among other things, recommends that the Commission approve a Bridge Rate that would be available to all residential customers who apply for NEM on or after January 1, 2023, until December 31, 2026, subject to certain early termination events and megawatt caps for each calendar year of the proposed Bridge Rate. If approved, this Bridge Rate would mitigate the devaluation of solar relative to Duke's Application, through 2026, by ensuring that all rooftop solar customers, subject to caps, can opt-out of the more onerous TOU rates proposed by Duke unless a Smart Saver, or other equivalent incentive, is approved by the Commission.

From NCRSI's perspective this is an improvement to the proposed NEM rates that should allow rooftop solar developers to serve North Carolinians that want to invest in solar through 2026. In the longer term, NCRSI urges the Commission to work with all stakeholders to develop NEM rates that fully reflect the value that customer-owned solar provides to Duke's generation, transmission and distribution systems and the value of solar to North Carolina's goal of reducing electric power sector greenhouse gas emissions by 70% by 2030 and attaining carbon neutrality by 2050. NCRSI recommends that the Commission approve the Stipulation in its entirety.

/s/ Kurt J. Boehm  
Kurt J. Boehm, Esq.  
BOEHM, KURTZ & LOWRY  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Ph: 513-421-2255  
e-mail: [kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)

C. Sanders McNew (NC Bar #45668)  
McNEW P.A.  
North Carolina Address:  
P.O. Box 6  
Mars Hill, North Carolina 28754  
Telephone: 561-299-0257  
E-mail: [sanders@mcnew.net](mailto:sanders@mcnew.net)

**COUNSEL FOR NORTH CAROLINA ROOFTOP  
SOLAR INSTALLERS**

DATED this 20<sup>TH</sup> day of May, 2022.

**CERTIFICATE OF SERVICE**

I certify that a copy of the Reply Comments of the North Carolina Rooftop Solar Installers' in Docket No. E-100, SUB 180 has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This, the 20<sup>th</sup> day of May, 2022

/s/ Kurt J. Boehm  
Kurt J. Boehm, Esq.

**COUNSEL FOR NORTH CAROLINA ROOFTOP  
SOLAR INSTALLERS**