BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

Docket No. E-100, SUB 180

DOCKET NO. E-100, SUB 180	:	REPLY COMMENTS OF SUNDANCE POWER
In the Matter of:	:	SYSTEMS, INC, SOUTHERN ENERGY MANAGEMENT, INC. and YES SOLAR
Investigation of Proposed Net Metering Policy Changes	:	SOLUTIONS; COLLECTIVELY, THE NORTH CAROLINA ROOFTOP SOLAR INSTALLERS

I. INTRODUCTION

Pursuant to the North Carolina Utilities Commission's ("Commission") May 13, 2022 Order, Sundance Power Systems, Inc, Southern Energy Management, Inc. and Yes Solar Solutions (collectively, the "North Carolina Rooftop Solar Installers" or "NCRSI") submit the following Reply Comments in support of the Stipulation between NCRSI and Duke Energy Carolinas, LLC's ("DEC") and Duke Energy Progress, LLC's ("DEP") (collectively "Duke") filed on May 19, 2022.

II. COMMENTS

On March 29, 2022 NCRSI filed its initial Comments regarding the net metering tariffs (collectively, the "NEM Tariffs") proposed by Duke. NCRSI argued that the NEM Tariffs do not comply with the House Bill 589 ("H.B. 589") requirement that the Commission shall establish nondiscriminatory net metering rates only after an investigation of the costs and benefits of customer-sited generation, and that the NEM Tariffs will damage the rooftop solar industry in North Carolina. NCRSI's primary objection was that Duke's proposal would devalue rooftop solar by an average of 28% when compared to current rates.

Shortly thereafter, Duke and NCRSI began a dialogue with the objective of agreeing to NEM rates that could serve as an alternative to the default time-of-use ("TOU") rate design for the NEM Tariffs proposed in Duke's Application. Duke and NCRSI agreed to a Stipulation that,

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

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COUNSEL FOR NORTH CAROLINA ROOFTOP **SOLAR INSTALLERS**

DATED this 20TH 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 20th day of May, 2022

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

COUNSEL FOR NORTH CAROLINA ROOFTOP SOLAR INSTALLERS