



Lawrence B. Somers
Deputy General Counsel

Mailing Address:
NCRH 20 / P.O. Box 1551
Raleigh, NC 27602

o: 919.546.6722
f: 919.546.2694

bo.somers@duke-energy.com

January 27, 2020

VIA ELECTRONIC FILING

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

**RE: Duke Energy Progress, LLC Request for Waiver of Annual Cost of Service
Studies Filing Requirement
Docket No. E-2, Sub 1142**

Dear Ms. Campbell:

Pursuant to the Commission's February 23, 2018 *Order Accepting Stipulation, Deciding Contested Issues and Granting Partial Rate Increase* in the above-referenced docket, Duke Energy Progress, LLC ("DEP") is required to file per-book cost of service studies based on the Summer Coincident Peak and Summer-Winter Peak and Average methodologies annually. To comply with this requirement, DEP must file its cost of service studies by April 30, 2020. However, DEP filed a general rate case application to adjust its rates and charges on October 30, 2019 in Docket No. E-2, Sub 1219, and that application contained updated cost of service studies.

Rather than file cost of service studies in October 2019 and then again in April 2020, DEP requests a waiver of the requirement to file the annual cost of service studies in 2020. The studies submitted with the general rate case application will serve as the annual cost of service studies required by the February 23, 2018 Order. Granting this waiver request will enable DEP to avoid the unnecessary costs and expense of two studies within a short period of time. DEP has discussed this with the Public Staff, and the Public Staff supports granting of the requested waiver. Accordingly, DEP submits that good cause exists for granting the relief requested herein.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

cc: Parties of Record

OFFICIAL COPY

Jan 27 2020

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Progress, LLC's Request for Waiver of Annual Cost of Service Studies Filing Requirement, in Docket No. E-2, Sub 1142, has been served by hand delivery, depositing a copy in the United States Mail, first class postage prepaid, or by electronic mail, properly addressed to the following parties of record:

David Drooz, Chief Counsel
Dianna Downey, Counsel
Lucy Edmondson, Counsel
Public Staff
North Carolina Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699-4326
david.drooz@psncuc.nc.gov
dianna.downey@psncuc.nc.gov
lucy.edmondson@psncuc.nc.gov

Sharon Miller
Carolina Utility Customers Assoc.
1708 Trawick Road
Suite 210
Raleigh, NC 27604
smiller@cucainc.org

Ralph McDonald
Warren Hicks
Bailey & Dixon, LLP
Counsel for CIGFUR
PO Box 1351
Raleigh, NC 27602
rmcdonald@bdixon.com
whicks@bdixon.com

Robert Page
Counsel for CUCA
Crisp, Page & Currin, LLP
4010 Barrett Drive, Ste. 205
Raleigh, NC 27609-6622
rpage@crisppage.com

Jennifer T. Harrod, Spec. Dep. Atty.
General
Margaret Force, Asst. Atty. General
Teresa L. Townsend, Asst. Atty. General
NC Department of Justice
P O Box 629
Raleigh, NC 27602-0629
pforce@ncdoj.gov
ttownsend@ncdoj.gov
jharrod@ncdoj.gov

Kristin Willis, Attorney
Counsel for NC WARN
2121 Damascus Church Rd.
Chapel Hill, NC 27516
kristin@ncwarn.com

Peter H. Ledford
NC Sustainable Energy Association
4800 Six Forks Road, Suite 300
Raleigh, NC 27609
peter@energync.org

J. Mark Wilson
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202-4003
markwilson@mvalaw.com

James P. West,
West Law Offices PC
434 Fayetteville Street
Suite 2325
Raleigh, NC 27601
jpwest@westlawpc.com

Glen C. Raynor
Young, Moore & Henderson, PA
P.O. Box 31627
Raleigh, NC 27627
gcr@youngmoorelaw.com

Paul Meggett
Appalachian State Univ.
P.O. Box 32126
Boone, NC 28608
meggettpa@appstate.edu

Karen M. Kemerait
Deborah Ross
Smith, Moore, Leatherwood, LLP
434 Fayetteville St., Ste. 2800
Raleigh, NC 27601
Karen.kemerait@smithmoorelaw.com
Deborah.ross@smithmoorelaw.com

Mona Lisa Wallace
John Hughes
Wallace & Graham, PA
525 N. Main St.
Salisbury, NC 28144
mwallace@wallacegraham.com

Nickey Hendricks, Jr.
The City of Kings Mountain
PO Box 429
Kings Mountain, NC 28086
nickh@cityofkm.com

Alan R. Jenkins
Jenkins At Law, LLC
2950 Yellowtail Ave.
Marathon, FL 33050
aj@jenkinsatlaw.com

John J. Finnigan, Jr.
Daniel Whittle
Environmental Defense Fund
4000 Westchase Blvd., Ste. 510
Raleigh, NC 27607
jfinnigan@edf.org
dwhittle@edf.org

Bridget Lee
Dorothy Jaffe
Sierra Club
50 F St. NW, 8th floor
Washington, DC 20001
Bridget.lee@sierraclub.org
Dori.jaffe@sierraclub.org

H. Julian Philpott, Jr.
NC Farm Bureau Federation Inc.
PO Box 27766
Raleigh, NC 27611
Julian.philpott@ncfb.org

Catherine Cralle Jones
Law Offices of Bryan Brice, Jr.
127 W. Hargett St., Ste. 600
Raleigh, NC 27601
cathy@attybryanbrice.com

Stephen B. Hamlin
Piedmont EMC
PO Drawer 1179
Hillsborough, NC 27278-1179
Steve.hamlin@pemc.coop

Gudrun Thompson
David Neal
SELC
601 W. Rosemary St., Ste. 220
Chapel Hill, NC 27516
gthompson@selcnc.org
dneal@selcnc.org

Brandon F. Marzo
Kiran Mehta
Troutman & Sanders, LLP
600 Peachtree St. NE, Ste. 5200
Atlanta, GA 30308
Brandon.marzo@troutmansanders.com
Kiran.mehta@troutmansanders.com

Mary Lynne Grigg
Brett Breitschwerdt
McGuireWood LLP
434 Fayetteville St., Ste. 2600
Raleigh, NC 27611
mgrigg@mcguirewoods.com
bbreitschwerdt@mcguirewoods.com

Timothy Barwick
209 Mullins Lane
Roxboro, NC 27573

Michael S. Colo
Poyner Spruill, LLP
PO Box 353
Rocky Mount, NC 27802
mscolo@poynerspruill.com

The Kroger Company
Attn: Corp. Energy Manager
1014 Vine St.
Cincinnati, OH 45202

Michael D. Youth
Richard Feathers
NCEMC
PO Box 27306
Raleigh, NC 27611
Michael.youth@ncemcs.com
Rick.feathers@ncemcs.com

Thomas H. Batchelor, Jr.
Haywood Electric Membership Corp.
376 Grindstone Rd.
Waynesville, NC 28785
Tom.batchelor@haywoodemc.com

Kurt J. Boehm
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 E. Seventh St., Ste. 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Kyle J. Smith, General Atty.
US Army Legal Svcs. Agency
9275 Gunston Road
Fort Belvoir, VA 22060-5546
Kyle.j.smith124@civ@mail.mil

J. Brian Pridgen
Gabriel Du Sablon
Cauley Pridgen, P.A.
2500 Nash St., Ste C
Wilson, NC 27896-1394
bpridgen@cauleypridgen.com
gdu sablon@cauleypridgen.com

Ben M. Royster
Royster & Royster PLLC
851 Marshall St.
Mt. Airy, NC 27030
benroyster@roysterlaw.com

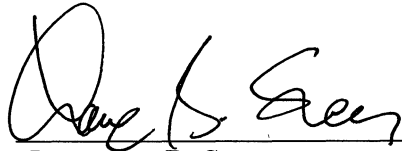
Bob Pate
City of Concord
35 Cabarrus Avenue W.
Concord, NC 28026
pateb@concordnc.gov

Kevin Higgins
Energy Strategies LLC
215 S. State St., Ste. 200
Salt Lake City, UT 84111
khiggins@energystrat.com

Paul Raaf
Office of the Forscom SJA
4700 Knox St.
Ft. Bragg, NC 28310-0001
Paul.a.raa.civ@mail.mil

Sarah W. Collins
NC League of Municipalities
PO Box 3069
Raleigh, NC 27602
scollins@nclm.org

This the 27th day of January, 2020.



Lawrence B. Somers
Deputy General Counsel
Duke Energy Corporation
P.O. Box 1551/ NCRH 20
Raleigh, North Carolina 27602
Tel: 919.546.6722
bo.somers@duke-energy.com