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

March 7, 2014

VIA LECTRONIC FILING

Ms. Gail L. Mount Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4325

Re: Docket No. E-100, Sub 137 Duke Energy Carolinas, LLC and Duke Energy Progress, Inc. Supplement to Integrated Resource Plans

Dear Ms. Mount:

Please accept this letter as a supplement to the 2013 Integrated Resource Plans ("IRPs") filed by Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, Inc. ("DEP") (collectively, the "Companies") in connection with the referenced matter. The Companies have identified two areas where they have corrected inputs used in the preparation of the 2013 IRPs, but as explained more fully below, neither correction had any impact on the overall conclusions contained in the previously-filed IRPs.

As discussed in the 2013 DEC and DEP IRPs, the Companies included an "Environmental Focus Scenario," which factors in significant increases in energy efficiency and renewable resources that would influence the plan if regulatory, legislative, or market conditions changed from today's base assumptions to support such increases. This scenario examines how the amount of traditional supply- side resources would change if future market conditions and/or state and federal regulations resulted in higher levels of energy efficiency and renewable resources.

The Environmental Focus Scenario contained the appropriate amount of wind and solar capacity for expansion planning. This capacity reflects the partial contribution of wind and solar in the capacity expansion plan. After the exchange of data requests with one of the intervenors in this case, however, the Companies have determined that the partial contribution of wind and solar (contribution to peak) was entered as the nameplate



capacity in the Environmental Focus Scenario production cost analysis, which underestimated the production value of these resources. The Companies have recalculated the production cost benefits using the wind and solar energy profile based on full nameplate capacity values. In the comparison of the Base Case to the Environmental Focus Scenario, this update reduced the difference between these two cases as originally shown on page 48 in the DEC 2013 IRP and page 45 in the DEP 2013 IRP as follows:

DEC Impact (Page 48) – Changes the difference between the Base Case and the Environmental Focus Scenario from \$2 Billion to \$1.3 Billion.

DEP Impact (Page 45) – Changes the difference between the Base Case and the Environmental Focus Scenario from \$0.5 Billion to \$0.1 Billion.

In addition, the Companies have determined that the Variable Operation and Maintenance (VOM) inputs to the 2013 IRPs for the existing fossil generation did not include the impacts of inflation in the production cost modeling analysis. This was also corrected in an updated analysis, but had a minimal impact on the analysis because it did not materially change the differences between cases. No corresponding change to the filed IRPs is necessary for the VOM analysis, but the Companies nonetheless wanted to provide this supplement to the Commission and other parties.

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

ncerely.

Lawrence B. Somers

Enclosure

cc: Parties of Record

CERTIFICATE OF SERVICE

I, Lawrence B. Somers, certify that a copy of Duke Energy Carolinas, LLC's and Duke Energy Progress, Inc.'s Supplement to Integrated Resource Plans in Docket No. E-100, Sub 137, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to the following parties for record:

Margaret A. Force Assistant Attorney General PO Box 629 Raleigh, NC 27602-0629 pforce@ncdoj.gov

Ralph McDonald Bailey & Dixon, LLP PO Box 1351 Raleigh, NC 27602-1351 rmcdonald@bdixon.com

Sharon Miller Carolina Utility Customer Association, Inc 1708 Trawick Road, Suite 210 Raleigh, NC 27604 smiller@cucainc.org

Robert Page Crisp, Page & Currin, LLP 410 Barrett Dr. Suite 205 Raleigh, NC 27609-6622 rpage@cpclaw.com

W. Mark Griffith Electricities of North Carolina 1427 Meadow Wood Blvd Raleigh, NC 27604 mgriffith@electricities.org

Shirley Mitchell Fountain Municipal Electric Department PO Box 134 Fountain, NC 27829 <u>TOFClerk2001@aol.com</u> H. Lawrence Armstrong, Jr. Armstrong Law, PLLC PO Box 187 Enfield, NC 27823 <u>hla@hlalaw.net</u>

Damon E. Xenopoulos Brickfield, Burchette, Ritts, & Stone, PC 1025 Thomas Jefferson St, NW Washington DC 20007 <u>dex@bbrslaw.com</u>

City Manager City of Concord PO Box 308 Concord, NC 28026-0308

Horace Payne Dominion North Carolina Power PO Box 26532 Richmond, VA 23261 horace.p.payne@dom.com

H. Wayne Wilkins Energy United EMC PO Box 1831 Statesville, NC 28687-1831 wayne.wilkins@energyunited.com

Becky Ceartas Greenpeace 306 Parham St, Suite 200-c Raleigh, NC 27601 becky.ceartas@greenpeace.org Richard Feathers Green Co Solutions, Inc. PO Box 27306 Raleigh, NC 27611-7306 rick.feathers@ncemcs.com

Norman Sloan Haywood EMC 376 Grinstone Rd Waynesville, NC 28785-6120 norman.sloan@haywoodemc.com

E. Keen Lassiter Law Offices of E. Keen Lassiter, P.A. 102-C Regency Blvd Greenville, NC 28590 ekllawoffice@yahoo.com

Bruce Burcat Mid-Atlantic Renewable Energy Coalition PO Box 385 Camden, DE 19934 <u>marec.org@gmail.com</u>

Kurt Olson NC Sustainable Energy Association PO Box 6465 Raleigh, NC 27628 <u>kurt@energync.org</u>

NC Warn 2812 Hillsborough Rd Durham, NC 27705 <u>ncwarn@ncwarn.org</u>

Roy Jones North Carolina Municipal Power Agency 1427 Meadow Wood Blvd Raleigh, NC 27626-0513 rjones@electricities.org Charles Guerry Halifax EMC PO Box 667 Enfield, NC 27823-0667 cguerry@halifaxemc.com

Robert Kaylor Law Office of Robert Kaylor 353 E. Six Forks Road Raleigh, NC 27609 <u>bkaylor@rwkaylorlaw.com</u>

E. Brett Breitschwerdt McGuire Woods, LLP. PO Box 27507 Raleigh, NC 27601 bbreitschwerdt@mcguirewoods.com

Richard Feathers NC Electric Membership Corporation PO Box 27306 Raleigh, NC 27611-7306 rick.feathers@ncemcs.com

Michael Youth NC Sustainable Energy Association PO Box 6465 Raleigh, NC 27628 <u>michael@energync.org</u>

Joseph Eason Nelson, Mullins, Riley, & Scarborough, LLP PO Box 30519 Raleigh, NC 27622-0519 joe.eason@nelsonmullins.com

R.G. Brecheisen Piedmont EMC PO Drawer 1179 Hillsborough, NC 27278-1179 randy.brecheisen@pemc.org Steve Blanchard Public Works Commission Fayetteville PO Box 1089 Fayetteville, NC 28302-1089 <u>steve.blanchard@faypwc.com</u>

Joseph Joplin Rutherford EMC PO Box 1569 Forest City, NC 28043-1569 jjoplin@remc.com

Charlotte Mitchell Law Office of Charlotte Mitchell 1117 Hillsborough Street PO Box 26212 Raleigh, North Carolina 27611 919.260.9901 www.lawofficecm.com

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

William Whisnant Town of Winterville 2571 Railroad St Winterville, NC 28590 terri.parker-eakes@wintervillenc.com

Alec Natt Energy United PO Box 1831 Statesville, NC 28687 <u>Alec.natt@energyunited.com</u>

Christopher J. Blake Nelson Mullins Riley and Scarborough PO Box 30519 Raleigh, NC 27622-0519 <u>Chris.blake@nelsonmullins.com</u> John Runkle Attorney 2121 Damascus Church Road Chapel Hill, NC 27516 jrunkle@pricecreek.com

Gudrun Thompson Southern Environmental Law Center 601 West Rosemary St, Suite 220 Chapel Hill, NC 27516-2356 gthompson@selcnc.org

Mark Calvert Tennessee Valley Authority 400 West Summitt Hill Dr – WT 6A-K Knoxville, TN 37902-1401 <u>mscalvert@tva.gov</u>

Lynette Romero Town of Oak City PO Box 298 Oak City, NC 27857 OAKCITY204@EMBARQMAIL.COM

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

Jerry L. Durmire President EnergyUnited Water Corporation P.O. Box 168 Stony Point, NC 28678

M. Gray Styers, Jr. Styers, Kemerait & Mitchell 1101 Haynes Street Raleigh, NC 27604 gstyers@styerskemerait.com

By:

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