

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 180**

In the Matter of:)	
Investigation of Proposed Net)	JOINT RESPONSIVE
Metering Policy Changes)	COMMENTS OF THE NORTH
)	CAROLINA SUSTAINABLE
)	ENERGY ASSOCIATION,
)	SOUTHERN ALLIANCE FOR
)	CLEAN ENERGY, AND VOTE
)	SOLAR

Pursuant to the *Order Granting Extension of Time to File Reply Comments and Allowing Parties to File Responsive Comments* issued by the North Carolina Utilities Commission on May 13, 2022, the North Carolina Sustainable Energy Association (“NCSEA”), the Southern Alliance for Clean Energy (“SACE”), and Vote Solar offer these joint responsive comments in support of the Stipulation filed by Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP”) (DEC and DEP, collectively, “the Companies” or “Duke Energy”), Sundance Power Systems, Inc. (“Sundance”), Southern Energy Management, Inc. (“SEM”), and Yes Solar Solutions (“Yes”) (Sundance, SEM, and Yes, collectively, the “North Carolina Rooftop Solar Installers”) on May 19, 2022.

SACE, Vote Solar, and NCSEA support the Stipulation filed in this docket between Duke Energy and the North Carolina Rooftop Solar Installers. The Proposed Bridge Rate is a reasonable modification of the original proposed Revised NEM rates, building upon the grandfathering provisions contained in the memorandum of understanding (“MOU”) between Duke Energy, SACE, Vote Solar, and NCSEA and proposed in the Companies’ application. The proposed Bridge Rate provides additional customer choice for a defined

time period, addresses the concerns about the proposed Smart Saver Solar incentive¹ being unavailable for customers with gas-heated homes, and eases the transition to the TOU-CPP rates.

SACE, Vote Solar, and NCSEA particularly support the exemption from the minimum monthly bill requirement for low-income and vulnerable households. As part of the original MOU with Duke Energy, SACE, Vote Solar, and NCSEA have agreed to work collaboratively with the Companies to develop a solar incentive for low-income customers that would build on the pending Smart Saver Solar incentives. Even though the minimum bill would not be a big factor for most customers, exempting certain income-eligible households from the minimum monthly bill is a creative way to help make sure that the bill-saving benefits of rooftop solar will be available to lower-income households.

The signatories to the MOU had already agreed to pursue additional incentives built on the proposed Smart Saver Solar incentive that would involve pairing rooftop solar with additional technologies that could reliably reduce peak demands. The commitment in the Stipulation to pursue an additional incentive program that would be compatible with gas-heated households, which cannot participate in the pending Smart Saver Solar incentive, is consistent with the expectation in the prior MOU and would be a welcome addition to the innovative package of new solar proposals that are reflected in these agreements with Duke Energy.

¹ Proposed by the Companies in Docket Nos. E-2, Sub 1287 and E-7, Sub 1261.

Respectfully submitted, this the 27th day of May 2022.

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing filing by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 27th day of May 2022.

/s/ Taylor M. Jones
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