

August 9, 2022

***VIA ELECTRONIC FILING***

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

Re: Response to Attorney General’s Office Motion to Direct Duke to Perform Additional Modeling (Docket No. E-100, Sub 179)

The North Carolina Sustainable Energy Association, the Southern Alliance for Clean Energy, the Sierra Club, and the Natural Resources Defense Council (collectively, the Coalition of Low-Cost Energy and Net-Zero Intervenors or CLEAN Intervenors) respectfully submit this joint response to the Motion to Direct Duke to Perform Additional Modeling filed by the Attorney General’s Office (AGO) on August 3, 2022 (the AGO’s Motion).

In its motion, the AGO requests, in summary, that the Commission direct Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, Duke Energy) to perform additional modeling with the changes to inputs recommended by the AGO in its July 15, 2022 comments, and to file the results of that modeling on or before August 19, 2022. In a response filed on August 5, 2022, Carolinas Clean Energy Business Association (CCEBA) supported the AGO’s motion but recommended a change to the maximum annual solar additions consistent with the solar interconnection limits proposed by the Clean Power Suppliers’ Association. On August 8, 2022, Duke Energy filed a response opposing the AGO’s Motion.

CLEAN Intervenors support the relief requested in the AGO’s Motion with the modification proposed by CCEBA. By supporting the relief requested by the AGO and CCEBA, however, CLEAN Intervenors would stress that EnCompass modeling conducted by Duke Energy should not be given any more weight by the Commission than EnCompass modeling conducted by other parties.<sup>1</sup> CLEAN Intervenors understand that the AGO’s concerns about relying on the results of modeling conducted by other parties comes directly from the difficulties that other parties have had validating the results of Duke’s modeling. EnCompass modeling results that can be validated by other parties or the Commission itself should be accorded the same searching and careful consideration by the Commission, regardless of the party conducting the modeling. In this instance, however, it is reasonable for a party that does not have access to an EnCompass license,

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<sup>1</sup> See AGO Motion, pp. 5-6 (“Were the modeling to be conducted by other parties, deviations may occur in results that would undermine the value of the modeling and prompt Duke to question the validity of a comparison.”).

to request that the Commission direct Duke Energy to perform additional modeling that would provide valuable information to the Commission as it deliberates and develops its Carbon Plan.

Respectfully submitted,

/s/ Taylor M. Jones

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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 9<sup>th</sup> day of August 2022.

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