

Kiran H. Mehta

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July 15, 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 and Duke Energy Carolinas, LLC's Joint Response
to the AGO Motion to Admit Supplemental Expert Testimony
Docket No. E-2, Sub 1219
Docket No. E-7, Sub 1214

Dear Ms. Campbell:

On behalf of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, the "Companies"), please find enclosed for electronic filing the Companies' *Joint Response to the AGO's Motion to Admit Supplemental Expert Testimony*.

Please do not hesitate to contact me should have you have any questions. Thank you for your assistance in this matter.

Sincerely,

/s/ Kiran H. Mehta

Kiran H. Mehta

Enclosure

cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1219

DOCKET NO. E-7, SUB 1214

DOCKET NO. E-2, SUB 1219)	
)	
In the Matter of)	DUKE ENERGY PROGRESS, LLC
)	AND DUKE ENERGY CAROLINAS,
Application by Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Utility Service in North Carolina)	LLC’S JOINT RESPONSE TO AGO
)	MOTION TO ADMIT
)	SUPPLEMENTAL EXPERT
)	TESTIMONY
DOCKET NO. E-7, SUB 1214)	
)	
In the Matter of)	
)	
Application by Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Utility Service in North Carolina)	
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)	
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NOW COMES Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively the “Companies”), by and through their legal counsel and pursuant to Rules R1-7 and R1-24 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), and hereby jointly respond to the proposed admission of the supplemental testimony of Attorney General’s Office (“AGO”) expert witness Mr. Richard A. Baudino filed July 10, 2020 (“AGO Motion”).

The AGO Motion requests permission, pursuant to N.C. Gen. Stat. § 62-133(c), to update Mr. Baudino’s testimonies to reflect and explain his analysis based on more recent

economic data, and to discuss changing economic conditions as they relate to the Companies and North Carolina customers. The AGO Motion states that “the extraordinary developments from COVID-19 are pertinent considerations in the rate cases, particularly as they affect the establishment of a fair rate of return.” (AGO Motion at 3.)

The Companies have the ultimate burden of persuasion in these Rate Cases. Accordingly, so long as they may file supplemental rebuttal testimony in response, the Companies have no objection to the submission of Mr. Baudino’s supplemental testimony. The Companies anticipate that they will be in position to file Supplemental Rebuttal no later than Monday, July 20, 2020. This approach comports with the *Order Granting Motion to Admit Supplemental Testimony* issued by this Commission on April 9, 2020 in Docket E-7, Sub 1214 (accepting AGO supplemental testimony but finding good cause to allow Duke Energy Carolinas to file rebuttal testimony in response).

Accordingly, the Companies respectfully request that the Commission enter an Order granting the AGO Motion and further granting the Companies leave to file Supplemental Rebuttal testimony of their ROE expert witness, Dylan W. D’Ascendis.

Respectfully submitted, this the 15th day of July, 2020.

/s/ Kiran H. Mehta

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ATTORNEY FOR DUKE ENERGY
PROGRESS, LLC AND DUKE ENERGY
CAROLINAS, LLC

CERTIFICATE OF SERVICE

DOCKET NO. E-2, SUB 1219
DOCKET NO. E-7, SUB 1214

I hereby certify that a copy of the foregoing **DUKE ENERGY PROGRESS, LLC AND DUKE ENERGY CAROLINAS, LLC JOINT RESPONSE TO AGO MOTION TO ADMIT SUPPLEMENTAL EXPERT TESTIMONY** was served electronically or by depositing a copy in United States Mail, first class postage prepaid, properly addressed to the parties of record.

This the 15th day of July 2020.

/s/ Kiran H. Mehta

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