



**North Carolina Sustainable Energy Association**  
**Education - Public Policy - Economic Development**

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**FILED**

**MAR 30 2010**

Clerk's Office  
N.C. Utilities Commission

March 30, 2010

Ms. Renee Vance  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699

RE: Docket No. E-7, Sub 831

Enclosed please find the original and thirty (30) copies of the North Carolina Sustainable Energy Association's Motion In Support of the Public Staff's Request to File a Response, and Request to File a Response to Duke Energy Carolinas, LLC's Motion for Clarification and Reconsideration of the Commission's Order Approving an Agreement and Joint Stipulation in the above referenced docket. All parties of record have been served.

Thank you for your attention to this matter.

Very truly yours,

Kurt Olson, Esq.  
Staff Counsel for NCSEA  
Bar # 22657  
PO Box 6465  
Raleigh, NC 27628

MM  
Full Dist.

MAR 30 2010

Clerk's Office  
N.C. Utilities CommissionBEFORE THE STATE OF NORTH CAROLINA UTILITIES COMMISSION  
RALEIGH, NC

DOCKET E-7, SUB 831

IN THE MATTER OF SAVE-A-WATT	)	NORTH CAROLINA SUSTAINABLE
APPROACH, ENERGY EFFICIENCY	)	ENERGY ASSOCIATION'S
RIDER AND ENERGY EFFICIENCY	)	MOTION IN SUPPORT OF PUBLIC
PORTFOLIO OF PROGRAMS	)	STAFF AND REQUEST TO FILE
	)	RESPONSE TO DUKE ENRGY
	)	CAROLINAS, LLC


**MOTION IN SUPPORT OF PUBLIC STAFF'S REQUEST FOR AN  
OPPORTUNITY TO RESPOND TO DUKE ENERGY CAROLINAS, LLC'S  
MOTION FOR CLARIFICATION AND RECONSIDERATION OF THE  
COMMISSION'S ORDER APPROVING THE AGREEMENT AND JOINT  
STIPULATION OF SETTLEMENT IN THE ABOVE REFERENCED DOCKET  
AND REQUEST TO FILE RESPONSE TO DUKE'S MOTION**

On or around February 9, 2010, the North Carolina Utility Commission (the "Commission") issued an Order approving a settlement agreement and joint stipulation in the above referenced proceeding (the "Agreement"). On March 10, 2010, Duke Energy Carolinas, LLC ("Duke") filed a Motion requesting clarification of certain changes the Commission made to the Agreement when the Order approving it was issued. Depending upon the clarification, Duke requested certain changes to the Agreement. On March 19, 2010, the Public Staff filed a letter with the Commission acknowledging Duke's Motion and requesting an opportunity to respond to the matters covered therein.

Duke's Motion for clarification and reconsideration relates to the compensation model in Duke's Save-A-Watt approach to energy efficiency and demand-side management. At the center of the Motion is an incentive designed to compensate Duke for "net loss revenues" or changes in revenue that Duke experiences by reason of a new energy efficiency measure. As a potential incentive, net loss revenues are important, yet controversial. A ruling on Duke's Motion will set wide-ranging precedent

in this area. Consequently, NCSEA supports the Public Staff's request that the issue be open for comment and similarly respectfully requests the opportunity to be heard on this matter as well by being allowed to file a response to Duke's Motion.

Respectfully submitted, the 30<sup>th</sup> day of March, 2010.




Kurt Olson, Esq.  
Staff Counsel for NCSEA  
Bar # 22657  
PO Box 6465  
Raleigh, NC 27628

**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing pleading or document and any attached exhibits 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 30th day of March, 2010

A handwritten signature in black ink, appearing to read "Kurt J. Olson", is written over a horizontal line.

Kurt J. Olson  
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