

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1219

DOCKET NO. E-7, SUB 1214

In the Matter of:)	
)	
Application of Duke Energy)	
Progress, LLC, for Adjustment of)	MOTION TO CORRECT
Rates and Charges Applicable to)	TRANSCRIPT BY
Electric Service in North Carolina)	NORTH CAROLINA JUSTICE
)	CENTER, NORTH CAROLINA
)	HOUSING COALITION, NATURAL
In the Matter of:)	RESOURCES DEFENSE COUNCIL,
)	AND SOUTHERN ALLIANCE FOR
Application of Duke Energy)	CLEAN ENERGY, AND NORTH
Carolinas, LLC, for Adjustment of)	CAROLINA SUSTAINABLE ENERGY
Rates and Charges Applicable to)	ASSOCIATION
Electric Utility Service in North)	
Carolina)	

The North Carolina Justice Center, North Carolina Housing Coalition, Natural Resources Defense Council, Southern Alliance for Clean Energy, and the North Carolina Sustainable Energy Association (collectively, the “Joint Movants”) respectfully request that the North Carolina Utilities Commission (“Commission”) correct a portion of the transcript of the consolidated hearing in the above-captioned dockets, as described and for the reasons explained in the following paragraphs.

1. On February 18, 2020, the Joint Movants filed the testimony and exhibits of Dennis Stephens in Docket No. E-7, Sub 1214. On April 13, 2020, the Joint Movants filed the testimony and exhibits of witness Stephens in Docket No. E-2, Sub 1219. Witness Stephens’ pre-filed testimony in each docket critiqued the Grid Improvement Plan (“GIP”) proposed by Duke Energy Carolinas and Duke Energy Progress (the “Companies”), and offered related recommendations.

2. On June 17, 2020, the Commission issued an Order Adopting Procedures for Expert Witness Hearings that, among other things, consolidated the expert witness hearings with regard to certain issues, including those related to the GIP.

3. On July 23, 2020, the Joint Movants and the Companies executed and filed an Agreement and Stipulation of Settlement that resolved certain issues amongst the settling parties, including issues related to the GIP.

4. On August 28, 2020, witness Stephens testified in the consolidated hearing in these dockets. After undersigned counsel moved Mr. Stephens' pre-filed testimony into the record of both dockets and he read his summary, he testified in response to questions from the Commission.

5. The testimony that is the subject of this motion appears in the transcript of the consolidated hearing at Volume 8, page 77, lines 5-6, and is excerpted below, with the preceding and subsequent lines included for context:

4 year, to actually get through that process -- that's why
5 we believe that they should reject the GIP program at
6 this point and set up that kind of a stakeholder-involved
7 process so that we can -- that stakeholder group could

6. After Volume 8 of the transcript became available, witness Stephens informed undersigned counsel that the testimony excerpted above was intended to refer to the recommendations in his pre-filed testimony, and that his use of the present tense resulted in a misstatement of his current position. Accordingly, Joint Movants seek to correct Volume 8 of the consolidated hearing transcript as follows, with the erroneous testimony indicated in strikethrough and the corrections indicated in italics:

4 year, to actually get through that process -- that's why
5 we ~~believe~~ *recommended in our pre-filed testimony* that they
should reject the GIP program at
6 ~~this~~ *that* point and set up that kind of a stakeholder-involved
7 process so that we can -- that stakeholder group could

7. Should the Commission allow the requested correction, no party will be prejudiced. The following parties have stated that they have no objection to this motion: the Attorney General's Office; Appalachian Voices and Center for Biological Diversity; Duke Energy Carolinas, LLC and Duke Energy Progress, LLC; Carolina Utility Customers Association; Carolina Industrial Group for Fair Utility Rates; the Commercial Group; Apple Inc., Facebook, Inc. and Google LLC (collectively, the "Tech Customers"); Harris Teeter, LLC; the North Carolina Clean Energy Business Alliance; the North Carolina League of Municipalities; NC WARN; the Public Staff; Sierra Club; and Vote Solar. No party raised an objection.

8. For the foregoing reasons, Joint Movants respectfully request that the Commission instruct the court reporter in these proceedings to correct Volume 8, page 77, lines 5-6 of the transcript of the consolidated hearing in the above-captioned dockets, as set forth in paragraph 6, above.

Respectfully submitted this 11th day of September, 2020.

/s/ Gudrun Thompson

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Correct Transcript by North Carolina Justice Center, North Carolina Housing Coalition, Natural Resources Defense Council, Southern Alliance for Clean Energy, and North Carolina Sustainable Energy Association as filed today in Docket Nos. E-2, Sub 1219 and E-7, Sub 1214 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 11th day of September, 2020.

s/ Gudrun Thompson