



Fox Rothschild LLP
ATTORNEYS AT LAW

434 Fayetteville Street
Suite 2800
Raleigh, NC 27601
Tel (919) 755-8700 Fax (919) 755-8800
www.foxrothschild.com

KAREN M. KEMERAIT
Direct No: 919.755.8764
Email: kkemerait@foxrothschild.com

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Jan 10 2020

January 10, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

RE: Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, for Approval of Competitive Procurement of Renewable Energy Program NCUC Docket Nos. E-2, SUB 1159, E-7, SUB 1156

Dear Ms. Campbell:

On behalf of North Carolina Clean Energy Business Alliance, the North Carolina Sustainable Energy Association, Duke Energy Progress, Duke Energy Carolinas, the CPRE Independent Administrator, and the Public Staff, collectively, submit the attached **Joint Motion** in the above-referenced dockets.

Should you have any questions concerning this testimony or exhibits attached thereto, please do not hesitate to contact me.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

skb

CC: All Parties of Record
Enclosures

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1159
DOCKET NO. E-7, SUB 1156

In the Matter of:
Joint Petition of Duke Energy Carolinas,
LLC and Duke Energy Progress, LLC, for
Approval of Competitive Procurement of
Renewable Energy Program

JOINT MOTION

NOW COME the North Carolina Clean Energy Business Alliance (“NCCEBA”), the North Carolina Sustainable Energy Association (“NCSEA”), Duke Energy Progress, LLC, Duke Energy Carolinas, LLC, the CPRE Independent Administrator (“IA”), and the Public Staff (collectively, “Joint Movants”), pursuant to Commission Rule R1-7, and respectfully move the North Carolina Utilities Commission (“Commission”) for (1) an extension to the closing date of February 17, 2020 for the acceptance of proposals for the Tranche 2 CPRE RFP Solicitation, and (2) a delay in the final Tranche 2 stakeholder meeting scheduled for January 16, 2020. In support of this Joint Motion, the Joint Movants show the Commission the following.

1. On July 2, 2019, the Commission issued its *Order Modifying and Accepting CPRE Program Plan* (“July 2, 2019 Order”), modifying Duke Energy Progress, LLC’s and Duke Energy Carolinas, LLC’s (together, “Duke”) CPRE Program Plan to reflect the adjusted timeline for implementation of the Tranche 2 CPRE RFP Solicitation. In the July 2, 2019 Order, the Commission directed Duke to adjust the Tranche 2 CPRE RFP Solicitation so that the acceptance of proposals would open on October 15, 2019 and close on December 15, 2019.

2. In the Commission's July 2, 2019 Order, the Commission required Duke to host monthly stakeholder meetings with interested stakeholders to provide detailed information about the RFP solicitation process. The stakeholder meetings were to continue through the close of the proposal submission period (i.e., December 15, 2019).

3. On July 15, 2019, Duke filed a Stakeholder Meeting Report and Schedule that scheduled stakeholder meetings on August 7, 2019, September 12, 2019, October 10, 2019, November 13, 2019, and December 12, 2019.¹

4. On October 7, 2019, the Commission issued its *Notice of Decision* in the Commission's 2018 biennial avoided cost proceeding in Docket No. E-100, Sub 158. In that *Notice of Decision*, the Commission provided its decisions related to the methodology and calculation of Duke's avoided cost rates under North Carolina's implementation of the Public Utilities Regulatory Policies Act of 1978 ("PURPA"). The *Notice of Decision* also announced that the Commission had not yet decided issues related to Duke's proposed Solar Integration Services Charge ("SISC"), and that the Commission was inclined to seek additional input from interested parties regarding the SISC's applicability to the CPRE Program.

5. Contemporaneous with issuing the *Notice of Decision*, the Commission issued an *Order Requesting Comments* in this proceeding to facilitate a discussion about whether, and, if so, how the SISC should be applied to the CPRE Program. The *Order Requesting Comments* stated that any party may file comments on or before October 18, 2019, and may file reply comments on or before October 25, 2019.² Duke, the Public

¹ Duke has hosted stakeholder meetings on August 7, 2019, September 12, 2019, October 10, 2019, and November 13, 2019.

² On October 25, 2019, the Commission issued its *Order Granting Extension of Time* to allow the parties until October 29, 2019 to file reply comments.

Staff, NCCEBA, NCSEA, and First Solar, Inc. filed initial comments on October 18, 2019 and reply comments on October 29, 2019.

6. On November 22, 2019, NCCEBA, NCSEA, Duke, the Public Staff, and the IA filed a joint motion requesting that the Commission extend the deadline for the submission of in the Tranche 2 CPRE RFP Solicitation to February 15, 2020 (or forty-five days after the Commission issues an order related to the SISC), and to reschedule the stakeholder meeting scheduled for December 15, 2019 (or thirty days prior to the deadline for submission of proposals in the Tranche 2 CPRE RFP Solicitation).

7. On December 2, 2019, the Commission issued its *Order Extending Tranche 2 CPRE RFP Solicitation Response Deadline and Rescheduling Stakeholder Meeting*. In the Order, the Commission directed the IA to extend the deadline for submission of proposals to the Tranche 2 CPRE RFP Solicitation to February 17, 2020, and to reschedule the stakeholder meeting to a date convenient to the IA.

8. The Commission has not yet issued an order about whether, and, if so, how the SISC should be applied to the CPRE Program.

9. Since the Commission has not yet issued an order providing guidance about whether, and, if so, how the SISC will be applied to the CPRE Program and has not approved the Requirements for Avoidance of SISC, the market participants are unable to prepare and finalize their proposals for the Tranche 2 CPRE RFP Solicitation. For that reason, the Joint Movants believe that a further extension to the closing for the acceptance of proposals for the Tranche 2 CPRE RFP Solicitation is necessary, and that the extension should be forty-five days after the Commission issues an order as to whether the SISC should be applied to the CPRE Program. Such an extension will

provide time for the market participants to prepare and finalize their proposals after receiving guidance from the Commission as to whether the SISC should be applied to the CPRE Program.

10. The Joint Movants also believe that a delay in the final Tranche 2 stakeholder meeting scheduled for January 16, 2020 is warranted so that Duke, the Public Staff, the IA, and the stakeholders may be able to discuss the outstanding issues for the Tranche 2 RFP Solicitation after receiving an order from the Commission about the applicability of the SISC to the CPRE Program. The Joint Movants request that the final stakeholder meeting be held no later than thirty days prior to the closing of the acceptance of proposals for the Tranche 2 CPRE RFP Solicitation.

WHEREFORE, the Joint Movants respectfully request that the Commission issue an order allowing:

1. An extension to the closing date for the acceptance of proposals for the Tranche 2 CPRE RFP Solicitation to forty-five days after the Commission issues an order as to whether the SISC should be applied to the CPRE Program; and
2. The final Tranche 2 stakeholder meeting to be held no later than thirty days prior to the closing for the acceptance of proposals for the Tranche 2 CPRE RFP Solicitation.

Respectfully submitted this the 10th day of January, 2020.

/s/ Karen M. Kemerait
Karen M. Kemerait
434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
kkemerait@foxrothschild.com
Telephone: (919) 755-8764
Attorney for: North Carolina
Clean Energy Business Alliance

/s/ Peter H. Ledford
Peter H. Ledford
4800 Six Forks Road, Suite 300
Raleigh, NC 27609
Telephone: 919-832-7601 Ext. 107
E-mail: peter@energync.org
Counsel for NCSEA

/s/ Benjamin W. Smith
Benjamin W. Smith
4800 Six Forks Road, Suite 300
Raleigh, NC 27609
Telephone: 919-832-7601 Ext. 111
E-mail: ben@energync.org
Counsel for NCSEA

/s/ Tim R. Dodge
Tim R. Dodge
Public Staff - NC Utilities Commission
430 N. Salisbury St.
Raleigh, NC 27603-5919
Telephone: 919-733-7328
E-mail: Tim.Dodge@psncuc.gov
Counsel for the Public Staff

/s/ Jack Jirak
Jack Jirak
Associate General Counsel
Duke Energy Corporation
P.O. Box 1551
Raleigh, NC 27602
Telephone: 919-546-3257
E-mail: Jack.Jirak@duke-energy.com
Counsel for Duke Energy Corporation

/s/Harold T. Judd
Harold T. Judd
CPRE Independent Administrator
ACCION GROUP, LLC
244 N. Main Street
The Carriage House
Concord, NH 03301
hjudd@acciongroup.com

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Joint Motion 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 10th day of January, 2020.

/s/ Karen M. Kemerait
Karen M. Kemerait
434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
kkemerait@foxrothschild.com
Telephone: (919) 755-8764
Attorney for: North Carolina
Clean Energy Business Alliance