

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1167
DOCKET NO. E-7, SUB 1166**

In the Matter of:)	
Application of Duke Energy Progress, LLC)	NCSEA’S COMMENTS ON
and Duke Energy Carolinas, LLC)	DUKE ENERGY PROGRESS,
Requesting Approval of Solar Rebate)	LLC’S AND DUKE ENERGY
Program Pursuant to N.C. Gen. Stat. § 62-)	CAROLINAS, LLC’S SOLAR
155(f))	REBATE PROGRAM
)	ANNUAL REPORT

NCSEA’S COMMENTS ON DUKE ENERGY PROGRESS, LLC’S AND DUKE ENERGY CAROLINAS, LLC’S SOLAR REBATE PROGRAM ANNUAL REPORT

Pursuant to the North Carolina Utilities Commission’s (“Commission”) *Order Allowing Comments* issued on April 24, 2019, the North Carolina Sustainable Energy Association (“NCSEA”), an intervenor in the above-captioned proceeding, offers the following comments on the Solar Rebate Program Report filed by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (DEP and DEC collectively “Duke”) on March 27, 2019 (“Annual Report”).

N.C. Gen. Stat. § 62-155(f), which codified Section 8.(a) of House Bill 589, Session Law 2017-192 (“H.B. 589”), provides for the details of the solar rebate program (the “Rebate Program”) that is the subject for the instant proceeding. Following internal analysis, NCSEA recommends the Commission allow for the program to stay largely unchanged at this time.

NCSEA agrees with Duke and the Public Staff regarding the reducing the frequency of Duke’s status reports from weekly to monthly for the remainder of 2019 as both the residential and commercial rebate allocation for this year have been exhausted and the non-

profit sector does not require weekly updates. NCSEA also agrees with the suggestion that in future years the status updates may be reduced to monthly frequency once residential and non-residential categories are exhausted assuming that each year will start with weekly updates until such exhaustion.

Regarding other changes to the program, NCSEA believes that wholesale changes to the 2020 rebate program are inappropriate at this time, as solar installers are well into their preparations for 2020 installations. NCSEA has conferred with its members about the program and come to the consensus that the current program makes it difficult for both installers and consumers to determine whether the customer will receive a rebate. Demand is high for distributed solar, and legislative changes may be required to achieve the best possible Rebate Program. The success of the Rebate Program makes clear that North Carolina's appetite for distributed solar was underestimated at the time that the legislature passed H.B. 589, and NCSEA believes that the program should be modified to allow for more consumers and businesses to have the opportunity to utilize the program. The limited size of the current program creates a "mad dash" situation for installers and customers where the ability to receive a rebate is determined by the timely click of a mouse.

For all the reasons set forth herein, NCSEA requests the program remain largely unchanged for the implementation of the year 2020 rebate allocation, excepting the limited changes requested by Duke regarding the status reports. NCSEA acknowledges that further and more wholesale changes may be necessary in the future years to improve the program, but recommends that any such changes be made in a timely manner that will allow installers a sufficient time period to adapt their business practices before the opening of a changed rebate program.

Respectfully submitted, this the 7th day of June, 2019.

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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 document 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 7th day of June, 2019.

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