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August 31, 2020

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

***RE: Petition for Approval of Revisions to Generator Interconnection Standards
Reply Comments of North Carolina Clean Energy Business Alliance
and North Carolina Sustainable Energy Association
NCUC Docket No. E-100, Sub 101***

Dear Ms. Campbell:

On behalf of the North Carolina Clean Energy Business Alliance (“NCCEBA”) and the North Carolina Sustainable Energy Association (“NCSEA”), pursuant to the Commission’s August 27, 2019 *Order Requiring Queue Reform Proposal and Comments*, we submit this letter as reply comments regarding Duke Energy Carolinas, LLC’s and Duke Energy Progress, LLC’s (collectively, “Duke”) Revised Queue Reform Proposal as provided in Duke’s reply comments filed on August 31, 2020.

NCCEBA and NCSEA filed Joint Comments on Duke’s Queue Reform Proposal on June 15, 2020. After filing the June 15, 2020 Joint Comments, Duke and NCCEBA had a number of additional discussions in an effort to address the outstanding issues between them. As a result of those discussions, Duke made further revisions to its proposal as reflected in its Revised Queue Reform Proposal. Also, Duke provided to NCCEBA a cost control proposal that is provided as Attachment 5 to Duke’s reply comments, and Duke is in the process of developing documentation that provides generic cost information for various interconnections, including unit-cost estimates for particular upgrades. NCCEBA and NCSEA will need more time to consider Duke’s cost control proposal; but Duke, NCCEBA, and NCSEA will continue working to achieve a mutually

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agreeable framework for Duke's cost control mechanisms. Duke has indicated that it will update the Commission once a final resolution on this issue is achieved.

In light of the additional modifications made in Duke's Revised Queue Reform Proposal, NCCEBA and NCSEA are now in a position to support Duke's Revised Queue Reform Proposal. NCCEBA and NCSEA appreciate the collaborative process that has resulted in Duke's improved Revised Queue Reform Proposal.

Should you have any questions concerning this letter, please do not hesitate to contact me.

Sincerely,

/s/ Karen M. Kemerait

Karen M. Kemerait

pbb

cc: All parties of record