

August 10, 2016

To: Chief Clerk Gail Mount

The North Carolina Utilities Commission

4325 Mail Service Center Raleigh, NC 27699-4325

From: NC Sustainable Energy Association

4800 Six Forks Road, Suite 300

Raleigh, NC 27609

Re: Application of Duke Energy Carolinas, LLC for Approval of Demand-Side

Management and Energy Efficiency Cost Recovery Rider Pursuant to N.C. Gen.

Stat. § 62-133.9 and Commission Rule R8-69

(Docket No. E-7, Sub 1105)

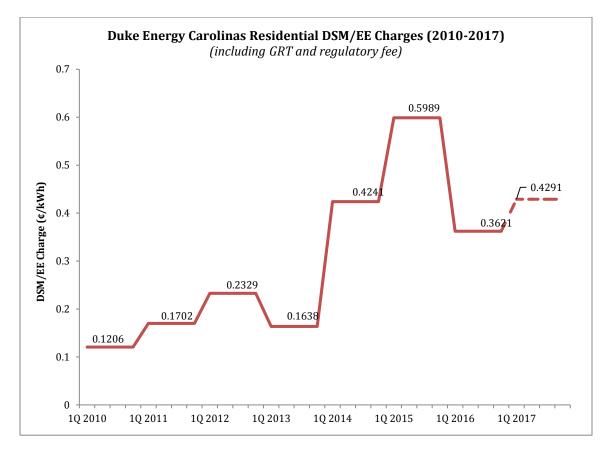
Honorable Clerk and Commissioners:

I serve as regulatory counsel for the North Carolina Sustainable Energy Association ("NCSEA"), an intervenor in this proceeding. NCSEA files this letter in lieu of a post-hearing brief in accordance with the *Notice of Mailing of Transcripts and Due Date of Post-Hearing Filings* issued by the North Carolina Utilities Commission ("Commission") on June 20, 2016. NCSEA does not challenge any costs for which Duke Energy Carolinas, LLC ("DEC") seeks recovery as unreasonable or imprudent. NCSEA does, however, seek to provide a temporal context for DEC's proposed demand-side management ("DSM") and energy efficiency ("EE") cost recovery rider.

In this proceeding, DEC requests approval of Rider 8 related to both DEC's save-a-watt pilot approved in Docket No. E-7, Sub 831 and the new cost recovery mechanism and portfolio of programs approved by the Commission in Docket No. E-7, Sub 1032. DEC requests a DSM/EE charge of 0.4291¢/kWh for residential ratepayers, an increase of approximately 0.067¢/kWh from the current DSM/EE charge. The proposed charge is put in temporal context in **Figure 1** below.



Figure 1¹



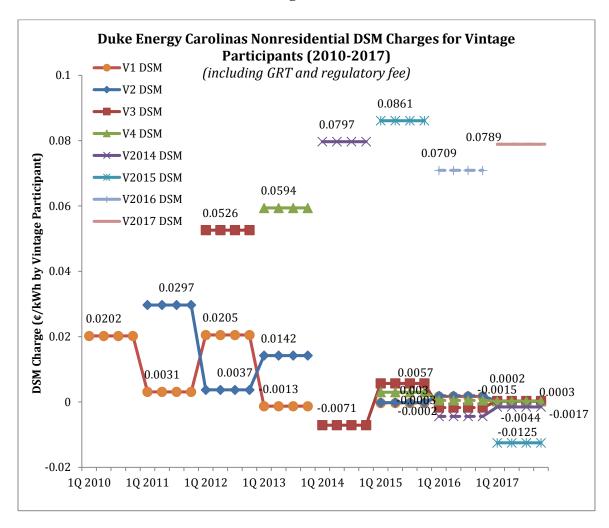
For nonresidential ratepayers who have opted-in to its DSM program, DEC proposes charges of 0.0002¢/kWh for V1 DSM participants, 0.0002¢/kWh for V2 DSM participants, 0.0003¢/kWh for V3 DSM participants, 0.0002¢/kWh for V4 DSM participants, -0.0015¢/kWh for V2014 DSM participants, -0.0125 for V2015 participants,

¹ Duke Energy Carolinas' Revised Tariff for Vintage 1 of Rider EE, p. 3 of 3, Docket No. E-7, Sub 831 (August 13, 2010); Order Approving Notice to Customers, Appendix A, Docket No. E-7, Sub 941 (September 20, 2010); Order Approving Notice to Customers of Change In Rates, Appendix A, p. 1 of 2, Docket No. E-7, Sub 979 (December 16, 2011); Order Approving Notice to Customers, Attachment, p. 1 of 2, Docket No. E-7, Sub 1001 (October 5, 2012); Order Approving Notice to Customers, Appendix A, p. 2 of 2, Docket No E-7, Sub 1031 (December 2, 2013); Order Approving Notice to Customers of Changes in Rates, Appendix A, p. 2 of 2, Docket No. E-7, Sub 1050 (November 26, 2014); Official Exhibits of Hearing Held June 2, 2015, Raleigh (As Marked), Supplemental Miller Exhibit 7, Docket No. E-7, Sub 1073 (June 15, 2015); Official Exhibits of Hearing Held June 7, 2016, Raleigh (As Marked), Supplemental Miller Exhibit 8, Docket No. E-7, Sub 1105 (June 17, 2016).



and 0.0789¢/kWh for V2017 DSM participants. The proposed charges are placed in temporal context in **Figure 2** below.

Figure 2²

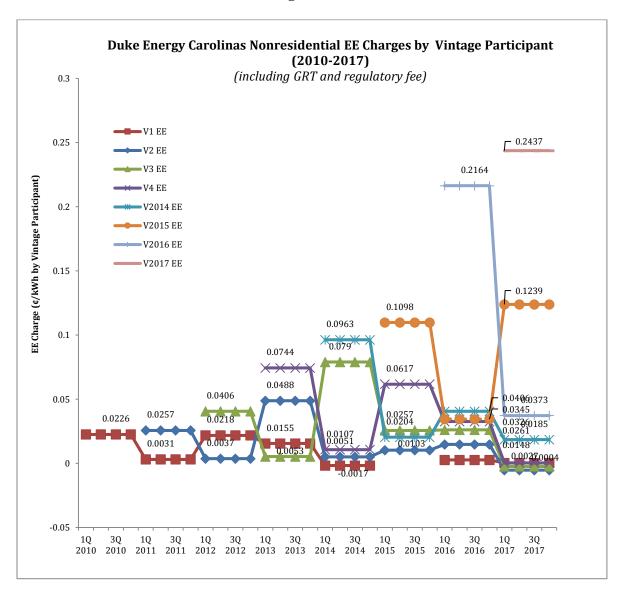


For nonresidential ratepayers who have opted-in to its EE program, DEC proposes charges of $0.0003 \ensuremath{\phi}$ /kWh for V1 EE participants, $-0.0053 \ensuremath{\phi}$ /kWh for V2 EE participants, $-0.0024 \ensuremath{\phi}$ /kWh for V3 EE participants, $0.0004 \ensuremath{\phi}$ /kWh for V4 EE participants, $0.0185 \ensuremath{\phi}$ /kWh for V2014 EE participants, $0.1239 \ensuremath{\phi}$ /kWh for V2015 EE participants, $0.0373 \ensuremath{\phi}$ /kWh for



V2016 EE participants, and 0.2437¢/kWh for V2017 EE participants. These proposed charges are placed in temporal context in **Figure 3** below.

Figure 3³



NCSEA does not challenge the reasonableness or prudency of any costs for which

DEC seeks recovery in its Rider 8 application.



Respectfully submitted,

/s/ Peter Ledford
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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 Post-Hearing Brief 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 <u>10th</u> day of August, 2016.

/s/ Peter Ledford
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