

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 101

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition for Approval of Revision to)
Generator Interconnection Standards)
)
)

**COMMENTS OF THE
PUBLIC STAFF ON DUKE'S
QUEUE REFORM
PROPOSAL**

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and respectfully submits the following comments on the May 15, 2020, interconnection queue reform proposal (“Proposal”) filed by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (DEP and DEC, collectively, “Duke”), in response to the Commission’s August 27, 2019, *Order Requiring Queue Reform Proposal and Comments* (“Queue Reform Order”) and subsequent Orders granting extensions of time in the above-referenced docket.

I. GENERAL COMMENTS

As described in detail in the background provided in the Proposal, Duke conducted an extensive stakeholder process over the last ten months to develop the Proposal and has worked to achieve consensus on a number of issues regarding the process. The Public Staff participated in these discussions and commends Duke’s efforts to committing resources and engaging stakeholders in order to find a meaningful way to address the interconnection challenges faced in

the DEC and DEP service territories. The Proposal is one of the key elements in the transition of the current generator interconnection process from a serial process to a more structured and definitive “first ready, first served” cluster study process that ensures that all participants in the interconnection process not only are treated equitably, but are also appropriately assigned costs and obligations associated with interconnecting their facility. The Public Staff further recognizes that for the implementation of these queue reform efforts to be successful, complementary regulatory approval by both the Public Service Commission of South Carolina (“SCPSC”) and the Federal Energy Regulatory Commission (“FERC”) will be necessary due to the combined nature of Duke’s interconnection queue. The Public Staff does not object to Duke’s request for Commission action on the Proposal on or before September 15, 2020, to allow the queue reform efforts undertaken in North Carolina to help guide and ensure that the queue reform efforts in South Carolina and FERC are aligned and continue to move forward in a timely fashion.

The Public Staff believes that Duke’s evaluation and modeling of its queue reform efforts on other queue reform efforts being undertaken throughout the country, and particularly the definitive cluster study process approved by FERC for the Public Service Company of Colorado (“PSCo”) is appropriate. Similar to the PSCo process that was approved by FERC, Duke’s Proposal provide a comprehensive framework to transition from a serial study process to a cluster-based definitive cluster study process. As noted by Duke, the landscape and challenges facing each utility’s interconnection queue are different. Duke has

experienced unprecedented demand for interconnection of utility-scale solar projects on the DEC and DEP distribution and transmission systems for many years. Through its efforts in the stakeholder process, Duke sought to tailor these needs to the specific challenges and concerns faced in North Carolina. While the Public Staff does not have any specific concerns or objections at this time to the timeframes, readiness milestones, financial security amounts, or penalty amounts contained in the Proposal, the Public Staff recommends that Duke file reports with the Commission after completion of the transitional study process and the initial definitive cluster study summarizing the interconnection customers (size/capacity) that participated in each process, the customers that withdrew prior to successful completion of the cluster, the actual experienced timeframes for completing each of the study phases, the sufficiency of the fees charged for implementing the transition and initial definitive cluster, and any recommended changes to these elements of the Proposal. The additional reports will provide the Commission and Public Staff with useful information in evaluating the participation and success of the queue reform efforts, and also to ensure that the costs associated with interconnection of new generation facilities was being appropriately allocated. The Public Staff also agrees with Duke that additional future stakeholder reviews of the process are appropriate.

Finally, it is the Public Staff's understanding that since the Queue Reform Proposal was filed, Duke and stakeholders have been continuing to work to reach consensus on some of the remaining points of difference in the Proposal that may be addressed in the comments of Duke or other parties. As such, to the extent

additional issues are raised in those comments, the Public Staff will seek to address those issues in its reply comments.

WHEREFORE, the Public Staff prays that the Commission take these comments into consideration in reaching its decision in this proceeding.

This the 15th day of June, 2020.

PUBLIC STAFF
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Electronically submitted
/s/ Tim R. Dodge
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CERTIFICATE OF SERVICE

I certify that a copy of these comments have been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 15th day of June 2020.

Electronically submitted
/s/ Tim R. Dodge