

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NOS. E-2, SUB 1167; E-7, SUB 1166

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In the Matter of)	
Application of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC, Requesting Approval of Solar Rebate Program Pursuant to G.S. 62-155(f))	COMMENTS OF SOUTHERN ALLIANCE FOR CLEAN ENERGY ON 2019 ANNUAL REPORT
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Pursuant to the North Carolina Utilities Commission’s (“Commission”) *Order Allowing Comments on 2019 Annual Report* in the above-referenced dockets, the Southern Alliance for Clean Energy (“SACE”) respectfully submits the following comments in response to the annual report filed jointly by Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC (collectively, “Duke”).

The annual report emphasizes two general points about the solar rebate program. First, there is clearly a great deal of pent-up demand among customers. Second, the program continues to suffer from a number of difficulties. The January 2020 application window illustrated both points very clearly: as Duke acknowledges in the report, rebates were fully claimed within minutes, while there were substantial glitches with the rollout.

SACE does not oppose Duke’s proposed alterations to the program. Specifically, it does not oppose Duke’s proposal not to alter the rebate amount for the 2021 program opening in light of the possibility that market participants have relied on the existing rebate amount; its proposal to increase marketing to nonprofits and provide monthly program updates during 2020; its commitment to perform the necessary technical fixes to

ensure that enrollment glitches are not repeated; or its proposal to include an additional application window in July.

However, there are additional ways to reform the program in order to better meet that pent-up demand, satisfy customers, and help to transition North Carolina to a clean-energy economy. To that end, SACE supports two additional changes recommended by the North Carolina Sustainable Energy Association. First, Duke should lower the limits on rebate-eligible solar installations to 5 kW for residential customers and 50 kW for commercial and industrial customers, effective in 2021. This is a simple way to allow more customers to participate in the program during each rebate window before the statutory capacity limit is met and therefore represents a good short-term solution. Second, Duke should open the 2021 tranche in October of this year. This will help to meet the overwhelming unmet demand left over from the last window sooner. It will also help our economy to recover from the effects of the ongoing pandemic.

If there were more time before the conclusion of the program under its current statutory term, it would be wise to investigate further improvements. As it stands, legislative changes and reauthorization are likely warranted before the program sunsets at the end of 2022. To the extent that improvements to the program in future years require legislative changes, the parties and/or the Commission could consider making such recommendations to the General Assembly.

Thank you for considering these comments.

Respectfully submitted this the 5th day of June, 2020.

s/Nick Jimenez
Nicholas Jimenez

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CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing comments either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 5th day of June, 2020.

s/Nicholas Jimenez