



September 18, 2019

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

Re: Duke Energy Carolinas, LLC's Application for Approval of Demand-Side  
Management and Energy Efficiency Cost Recovery Rider  
Docket No. E-7, Sub 1192

Dear Chief Clerk,

I submit this letter in lieu of formal comments on behalf of the North Carolina Sustainable Energy Association ("NCSEA"). As a member of the Duke Energy Carolinas, LLC ("DEC") Collaborative, I want to provide the Commission with the perspective of someone who has been attending Collaborative meetings for almost four years and to support some of the comments made by the Southern Alliance for Clean Energy ("SACE") and North Carolina Justice Center ("NCJC").

As noted by DEC and others, the Collaborative meetings are now bi-monthly and combined for DEC and Duke Energy Progress, LLC ("DEP"). This adjustment along with process reforms, such as shared agenda development, have reduced some past inefficiencies with Collaborative meetings and have increased the level of substantive discussion and collaboration among members. The Collaborative has also recently benefitted from the participation of new members who represent interest groups from both North and South Carolina.

However, as noted by SACE and NCJC Witness Forest Bradley-Wright, there is still room for improvement. I share the concerns of Witness Bradley-Wright about the projected decline of annual savings for DEC from over one-percent down to 0.84% in annual savings DEC forecasts for 2020 and believe this should be a key issue for the Collaborative to address in upcoming meetings. With uncertainty around federal rules related to energy efficiency, such as lighting standards, it is important that Collaborative develop an accurate projection of the potential for energy efficiency opportunities that can be pursued by DEC and DEP regardless of what happens with federal standards.



These discussions can also help the Collaborative advance the energy efficiency recommendations included in the North Carolina Energy Efficiency Roadmap and Clean Energy Plan that were initiated by Governor Cooper's Executive Order 80. I also echo Witness Bradley-Wright's recommendation that the Commission continue to monitor the efforts by the Collaborative over the coming year and encourage Commissioners or Commission staff to attend a Collaborative meeting and observe the discussions.

Sincerely,

Daniel Brookshire  
Regulatory and Policy Analyst  
North Carolina Sustainable Energy Association