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August 31, 2016

**VIA ELECTRONIC FILING**

Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Carolinas, LLC's' 2012 Revised REPS Compliance Plan  
and Duke Energy Progress, LLC's 2012 Revised REPS Compliance  
Plan  
Docket No. E-100, Sub 137**

Dear Chief Clerk:

Pursuant to the Commission's June 3, 2013 *Order Granting in Part and Denying in Part Motion for Disclosure* in Docket No. E-100, Sub 137 (the "June 3, 2013 Order"), enclosed please find Duke Energy Carolinas, LLC's ("DEC") Revised Exhibit B of its 2012 Renewable Energy and Energy Efficiency Portfolio Standard ("REPS") Compliance Plan and Duke Energy Progress, LLC's ("DEP") revised pages D-4, D-5 and D-6 and Revised Exhibit A of its 2012 REPS Compliance Plan. The June 3, 2013 Order required DEC and DEP to annually review their REPS compliance plans from four years earlier and disclose any redacted information that is no longer considered a trade secret.

DEC has reviewed its 2012 REPS Compliance Plan and determined that certain information contained in Exhibit B no longer qualifies as a trade secret: the contract duration, the estimated MWhs and estimated Renewable Energy Certificates ("RECs") for compliance with REPS set-aside requirements. However, certain information in Exhibit B remains a trade secret and commercially sensitive information, and DEC renews its earlier request to treat this information confidentially pursuant to N.C. Gen. Stat. § 132-1.2. The redacted information includes the names of counterparties with whom DEC has contracted for RECs. Public disclosure of this information would harm DEC's ability to negotiate and procure cost-effective purchases and discourage potential bidders from participating in requests for proposals.

OFFICIAL COPY

Aug 31 2016

DEP has reviewed its 2012 REPS Compliance Plan and determined that certain information contained on pages D-4, D-5 and D-6 and Exhibit A in Appendix D no longer qualifies as a trade secret: projected compliance data for 2012-2014 plus contract duration, the estimated MWhs and estimated RECs for signed contracts. However, certain information on those pages is still a trade secret and commercially sensitive information, and DEP renews its earlier request to treat this information confidentially pursuant to N.C. Gen. Stat. § 132-1.2. The redacted information contains names of counterparties with whom DEP has contracted for RECs. Public disclosure of this information would harm DEP's ability to negotiate and procure cost-effective purchases and discourage potential bidders from participating in requests for proposals.

Because the confidential data filed on September 4, 2012 has not changed, DEC and DEP are not re-filing the confidential version of those pages. Parties to the docket may contact DEC and DEP to obtain copies pursuant to an appropriate confidentiality agreement.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Kendrick C. Fentress", written in a cursive style.

Kendrick C. Fentress

Enclosures

cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET E-100, SUB 137

In the Matter of	) DUKE ENERGY CAROLINAS, LLC'S 2012
Investigation of the Integrated Resource	) RENEWABLE ENERGY & ENERGY
Plan in North Carolina for 2012	) EFFICIENCY PORTFOLIO STANDARD
	) COMPLIANCE PLAN (REVISED AUGUST
	) 2016)

**Duke Energy Carolinas, LLC's 2012 REPS Compliance Plan (Revised August 2016)**

**EXHIBIT B: Duke Energy Carolinas' Renewable Resource Procurement from 3<sup>rd</sup> Parties (signed contracts)**

**Docket No. E-100, Sub 137**

**[BEGIN CONFIDENTIAL]**

CONFIDENTIAL

Resource Supplier	Contract Duration	Estimated RECs		
		2012	2013	2014
Solar Resources				
[REDACTED]	20 years *	29,046	28,901	28,756
[REDACTED]	5 years *	300	300	300
[REDACTED]	20 years *	423	421	419
[REDACTED]	10 years	6,000	8,000	8,000
[REDACTED]	20 years *	6,900	6,890	6,880
[REDACTED]	15 years	353	353	353
[REDACTED]	15 years *	240	240	240
[REDACTED]	15 years *	134	134	134
[REDACTED]	5 years *	115	115	115
[REDACTED]	5 years *	80	80	80
[REDACTED]	5 years *	83	200	200
[REDACTED]	5 years	575	571	567
[REDACTED]	5 years	357	354	352
[REDACTED]	4 years	1,000	-	-

[REDACTED]	<1 year	6,000	-	-
[REDACTED]	3 years	2,800	-	-
	Total Solar REC Purchases	54,406	46,559	46,396
<b>Biomass Resources</b>				
[REDACTED]	20 years *	62,479	71,405	71,405
[REDACTED]	20 years *	13,000	13,000	13,000
[REDACTED]	20 years *	24,835	24,835	24,835
[REDACTED]	10 years *	19,800	34,059	34,059
[REDACTED]	10 years *	24,000	24,000	24,000
[REDACTED]	20 years *	21,122	20,893	20,893
[REDACTED]	15 years *	16,819	16,819	16,819
[REDACTED]	9 years *	9,000	10,000	10,500
[REDACTED]	8 years *	97,500	145,000	145,000
[REDACTED]	15 years *	-	2,500	3,500
[REDACTED]	15 years *	-	18,619	74,475
[REDACTED]	20 years *	1,627	4,880	12,851
[REDACTED]	10 years *	-	35,389	40,897
[REDACTED]	20 years *	-	12,614	12,614
[REDACTED]	15 years	-	8,083	32,331
	Total Biomass REC Purchases	290,182	442,096	537,179

<b>Wind Resources</b>				
	<1 year	199,848	-	-
	<1 year	275,611	-	-
	<1 year	167,453	-	-
	<1 year	438,000	-	-
	Total Wind REC Purchases	1,080,912	-	-
<b>Poultry Waste to Energy Resources</b>				
	20 years *	8,540	25,620	67,466
	10 years	-	23,332	70,000
	12 years	-	-	135,038
	Total Poultry REC Purchases	8,540	48,952	272,504
<b>Swine Waste to Energy Resources</b>				
	10 years	512	512	512
	10 years	1,667	20,000	20,000
	20 years	175	4,205	4,205
	20 years	-	4,541	4,541
	20 years	-	2,704	11,353
	20 years	-	-	13,624
	Total Swine Purchases	2,354	31,962	54,235
<b>Hydro Electric Resources</b>				
	5 years *	400		

[REDACTED]	5 years *	5,000		
[REDACTED]	5 years *	14,000		
[REDACTED]	5 years *	350		
[REDACTED]	5 years *	1,800		
[REDACTED]	5 years *	5,000		
[REDACTED]	5 years *	5,000		
[REDACTED]	5 years *	3,600		
[REDACTED]	5 years *	4,000		
[REDACTED]	5 years *	3,200		
[REDACTED]	5 years *	4,500		
[REDACTED]	8 years *	3,000	3,000	3,000
[REDACTED]	8 years *	9,000	9,000	9,000
[REDACTED]	8 years *	6,000	6,000	6,000
[REDACTED]	8 years *	12,000	12,000	12,000
[REDACTED]	5 years *	9,000		
[REDACTED]	5 years *	6,000		
[REDACTED]	5 years *	1,500		
[REDACTED]	5 years	350		
[REDACTED]	5 years *	400		
[REDACTED]	5 years *			

		1,500		
	5 years *	7,000		
	Total Hydro purchases	102,600	30,000	30,000

Notes:

\* Indicates bundled purchase of REC and energy, as opposed to a REC-only purchase

[END CONFIDENTIAL]



**Progress Energy Carolinas**

**Integrated Resource Plan**

**Appendix D**

**Alternative Supply Resources**

**NC REPS Compliance Plan**

**September 2012**

RECs. Table 3 below displays Progress Energy Carolinas' projected compliance with the general REPS requirement. The Contracted Purchases represent expected deliveries from projects under contract. The Undesignated Resources shows the estimated number of additional RECs that PEC needs to secure to be compliant with its pro-rata share of the swine and poultry requirements, as described below.

**Table 3: PEC Compliance with the Total REPS Compliance Obligation**

Compliance Year	2012	2013	2014
Contracted Purchases	1,302,608	1,376,467	1,404,366
Undesignated Resources	0	0	40,152
Energy Efficiency	280,150	276,517	279,419
Total Supply Resources and EE (RECs)	1,582,758	1,652,984	1,723,937
REPS Requirement (RECs)	1,125,267	1,110,736	1,122,357
Over or (Under) Supply of Resources Relative to Requirement (RECs)	457,491	542,248	601,580
Beginning REC Balance (Dec 31, 2011)	3,569,057	4,026,547	4,568,795
RECs Added (Removed)	457,491	542,248	601,580
Ending REC Balance	4,026,547	4,568,795	5,170,376

### **III. G.S. § 62-133.8(c): RENEWABLE ENERGY AND ENERGY EFFICIENCY STANDARDS FOR ELECTRIC MEMBERSHIP CORPORATIONS AND MUNICIPALITIES**

While this requirement does not apply specifically to PEC, a number of wholesale customers, as described above, have agreements with PEC whereby PEC will obtain the RECs necessary for the wholesale customer's compliance. Table 1 shows the load and associated REPS requirement for these wholesale customers. In addition, Table 10 includes the anticipated premium cap for these wholesale customers.

PEC continues to refine development of the overall process to comply on behalf of these wholesale customers. The costs associated with renewable resources procured to comply with the combined retail loads of PEC and the wholesale customers are included in PEC's compliance plan and will be allocated across the total RECs and recovered appropriately. The details of all purchases and the cost allocation to each party will be included in PEC's annual compliance report filing.

**IV. G.S. § 62-133.8(d): COMPLIANCE WITH REPS REQUIREMENT THROUGH USE OF SOLAR ENERGY RESOURCES**

In order to achieve compliance with the initial solar set-aside requirements, PEC has executed a number of solar contracts, as listed on Exhibit A. In addition to these contracts, PEC has maintained a commercial PV program since July 2009 that has a target of adding five (5) MWs of grid-tied solar PV per year. PEC also implemented a residential PV program on January 1, 2011 with a target of adding one (1) MW per year of distributed solar generation. PEC issued a solar RFP in June 2011 for grid-connected projects ranging in size from one (1) to three (3) MW. This RFP resulted in six (6) contracts for over twelve (12) MWs of capacity. Table 4 shows the solar set-aside requirement. The Contracted Solar column shows the anticipated production from both contracted PV and solar thermal projects that vary in technology, size, and geographic location.

**Table 4: Compliance with the Solar Set-Aside**

Compliance Year	Solar Set-Aside Requirement (RECs)	Contracted Solar (RECs)	Delta with Requirement (RECs)	Beginning Solar REC Position (RECs)	Ending Solar REC Position (RECs)
2012	26,256	26,617	360	21,258	21,619
2013	25,917	38,886	12,968	21,619	34,587
2014	26,188	38,581	12,393	34,587	46,980

**V. G.S. § 62-133.8(e): COMPLIANCE WITH REPS REQUIREMENT THROUGH USE OF SWINE RESOURCES**

On February 12, 2010, in Docket E-100, Sub 113, the Commission issued an Order approving the issuance of a joint RFP as a means for the state's electric power suppliers to work together to collectively meet the swine waste resource set-aside. The state's electric power suppliers ("Swine REC Buyers Group") issued a joint RFP for swine waste generation on February 15, 2010. Through this RFP, PEC executed five (5) contracts. Project developers estimated that they would collectively build as many as twenty-five (25) swine waste-to-energy facilities throughout North Carolina and that total REC production would exceed the statewide aggregate Swine Set-Aside requirement for 2012 and 2013. In the spring of 2012, the Swine REC Buyers Group terminated four (4) contracts for reasons including consistent failure to develop the project, inability to assign the contract to another developer, and consistent failure to demonstrate progress toward commercial operation. After terminating these contracts, PEC has one (1) long-term swine REC contract, as shown on Exhibit A. As described in the Amended Joint Motion in Docket No. E-100, Sub 113 filed July 17<sup>th</sup>, 2012, PEC and other electric power suppliers are seeking to delay the swine and poultry waste set-aside requirement of N.C. Gen. Stat. §§ 62-133.8 (e) and (f), respectively, by two years to

allow additional time to meet compliance with these requirements (“Amended Joint Motion”). Table 5 below shows the swine set-aside requirement. The Contracted Swine column shows the number of swine RECs PEC has under contract and expects to receive by year. The Undesignated Swine column shows the estimated number of additional RECs that PEC needs to secure to be compliant with the 2014 swine requirement.

**Table 5: Compliance with the Swine Set-Aside**

Compliance Year	Swine Set-Aside Requirement (RECs)	Contracted Swine (RECs)	Undesignated Swine (RECs)	Total Swine Resources (RECs)
2012	26,256	-	-	-
2013	25,917	5,323	-	5,323
2014	26,188	18,871	1,995	20,866

## VI. G.S. § 62-133.8(f): COMPLIANCE WITH REPS REQUIREMENT THROUGH USE OF POULTRY WASTE RESOURCES

As described in the Amended Joint Motion in Docket No. E-100, Sub 113 filed July 17<sup>th</sup>, 2012, PEC and other electric power suppliers are seeking to delay the swine and poultry waste set-aside requirement of N.C. Gen. Stat. §§ 62-133.8 (e) and (f), respectively, by two years to allow additional time to meet compliance with these requirements (“Amended Joint Motion”). The statewide requirement for poultry waste is 170,000 RECs in 2012, 700,000 RECs in 2013, and 900,000 RECs in 2014. PEC projects its pro-rata requirement for 2012 is 49,354 RECs, PEC’s requirement in 2015 is approximately 203,000 RECs, and PEC’s requirement in 2016 is approximately 261,000 RECs. In July 2010 PEC joined with other electric suppliers and issued a Joint Poultry RFP, resulting in six (6) proposals from four (4) counterparties. From this RFP, in June 2012, PEC signed contracts to purchase energy and RECs from two 34.5 MW poultry waste-to-energy facilities. PEC will purchase 100% of the energy and capacity from these facilities, and 68.82% of the RECs. Other electric suppliers will purchase the remainder of the RECs. Once fully online, this project is expected to deliver over 263,000 poultry RECs annually to PEC. Table 6 below shows the poultry set-aside requirement. The Contracted Poultry column shows the projection of the RECs PEC will receive under these contracts. The Undesignated Poultry column shows the estimated number of additional RECs that PEC needs to secure to be compliant with its pro-rata share of the 170,000 statewide requirement by 2014.

**Table 6: Compliance with the Poultry Set-Aside**

Compliance Year	Poultry Set-Aside Requirement (RECs)	Contracted Poultry (RECs)	Undesignated Poultry (RECs)	Total Poultry Resources (RECs)
2012	49,354	-	-	-
2013	203,224	-	-	-
2014	261,288	11,198	38,157	49,354

**REDACTED VERSION**

[BEGIN CONFIDENTIAL]

EXHIBIT A: Progress Energy Carolinas' Renewable Resource Procurement from 3<sup>rd</sup> Parties (signed contracts as of July 31, 2012)

Resource Supplier	Contract Duration	Estimated MWh			Estimated RECs		
	* Indicates bundled purchase including energy	2012	2013	2014	2012	2013	2014
SOLAR RESOURCES							
	10 years *	59	59	58	59	59	58
	20 years *	210	626	621	210	626	621
	20 years *	312	309	307	312	309	307
	20 years *	166	657	652	166	657	652
	20 years *	39	39	38	39	39	38
	20 years *	6	14	14	6	14	14
	20 years *	628	623	618	628	623	618
	20 years *	225	297	295	225	297	295
	20 years *	201	599	594	201	599	594
	20 years *	302	299	297	302	299	297
	20 years *	11	14	14	11	14	14
	10 years *	92	91	90	92	91	90
	20 years *	31	31	31	31	31	31
	20 years *	26	26	26	26	26	26
	20 years *	800	794	788	800	794	788
	20 years *	342	339	337	342	339	337
	20 years *	299	297	295	299	297	295
	20 years *	1,242	1,642	1,629	1,242	1,642	1,629
	20 years *	36	35	35	36	35	35
	20 years *	204	486	483	204	486	483
	20 years *	231	250	248	231	250	248
	10 years	-	-	-	69	69	69

**REDACTED VERSION**

		25	24	24	25	24	24
[REDACTED]	20 years *	14	14	14	14	14	14
[REDACTED]	20 years *	1,156	1,530	1,517	1,156	1,530	1,517
[REDACTED]	20 years *	1,183	1,564	1,552	1,183	1,564	1,552
[REDACTED]	20 years *	37	37	37	37	37	37
[REDACTED]	20 years *	677	672	666	677	672	666
[REDACTED]	20 years *	322	319	317	322	319	317
[REDACTED]	20 years *	127	126	125	127	126	125
[REDACTED]	20 years *	102	102	101	102	102	101
[REDACTED]	15 years	-	-	-	200	200	200
[REDACTED]	15 years	-	-	-	50	50	50
[REDACTED]	20 years *	601	596	591	601	596	591
[REDACTED]	20 years *	250	248	246	250	248	246
[REDACTED]	15 years	-	-	-	350	350	350
[REDACTED]	20 years *	299	297	295	299	297	295
[REDACTED]	20 years *	155	154	153	155	154	153
[REDACTED]	20 years *	82	196	194	82	196	194
[REDACTED]	20 years *	247	245	243	247	245	243
[REDACTED]	20 years *	35	34	34	35	34	34
[REDACTED]	20 years *	35	35	35	35	35	35
[REDACTED]	20 years *	35	35	35	35	35	35
[REDACTED]	20 years *	7	14	14	7	14	14
[REDACTED]	20 years *	13	13	13	13	13	13
[REDACTED]	20 years *	11	14	14	11	14	14
[REDACTED]	20 years *	9	19	19	9	19	19
[REDACTED]	20 years *	28	33	33	28	33	33
[REDACTED]	20 years *	13	16	16	13	16	16
[REDACTED]	20 years *	20	20	20	20	20	20
[REDACTED]	20 years *	158	626	621	158	626	621
[REDACTED]	20 years *	2,365	3,128	3,103	2,365	3,128	3,103

**REDACTED VERSION**

[REDACTED]	20 years *	1,627	1,614	1,601	1,627	1,614	1,601
[REDACTED]	20 years *	1,564	1,552	1,539	1,564	1,552	1,539
[REDACTED]	20 years *	1,892	3,754	3,724	1,892	3,754	3,724
[REDACTED]	20 years *	151	599	594	151	599	594
[REDACTED]	20 years *	641	636	631	641	636	631
[REDACTED]	20 years *	162	643	636	162	641	636
[REDACTED]	20 years *	297	295	292	297	295	292
[REDACTED]	20 years *	1,261	1,877	1,862	1,261	1,877	1,862
[REDACTED]	20 years *	1,357	1,346	1,336	1,357	1,346	1,336
[REDACTED]	15 years	-	-	-	90	90	90
[REDACTED]	20 years *	354	602	597	354	602	597
[REDACTED]	20 years *	1,710	1,697	1,683	1,710	1,697	1,683
[REDACTED]	20 years *	402	4,779	4,741	402	4,779	4,741
[REDACTED]	20 years *	299	297	295	299	297	295
[REDACTED]	20 years *	31	31	31	31	31	31
[REDACTED]	20 years *	402	532	528	402	532	528
[REDACTED]	15 years	-	-	-	114	114	114
[REDACTED]	20 years *	124	123	122	124	123	122
<i>Total solar resources</i>		<b>25,743</b>	<b>38,013</b>	<b>37,709</b>	<b>26,617</b>	<b>38,886</b>	<b>38,581</b>

**BIOMASS RESOURCES**

[REDACTED]	10 years *	75,686	75,686	75,686	75,686	75,686	75,686
[REDACTED]	10 years *	270,855	270,855	270,855	88,780	88,780	88,780
[REDACTED]	10 years *	501,371	501,371	501,371	164,338	164,338	164,338
[REDACTED]	15 years *	-	13,876	13,876	-	13,876	13,876
[REDACTED]	6 years *	200,548	200,000	200,000	200,548	200,000	200,000
[REDACTED]	6 years	-	-	-	50,000	50,000	50,000
[REDACTED]	7 years *	358,387	357,408	357,408	358,387	357,408	357,408
[REDACTED]	15 years *	-	47,654	47,654	-	47,654	47,654
[REDACTED]	5 years *	18,569	18,519	18,519	16,712	16,667	16,667

**REDACTED VERSION**

██████████	12 years *	20,950	20,893	20,893	20,950	20,893	20,893
████████████████████	20 years *	-	-	804	-	-	553
<i>Total 3rd party biomass resources</i>		<b>1,446,367</b>	<b>1,506,262</b>	<b>1,507,065</b>	<b>975,402</b>	<b>1,035,303</b>	<b>1,035,856</b>
<b>POULTRY WASTE TO ENERGY RESOURCES</b>							
██████████	20 years *	-	-	17,075	-	-	11,198
<i>Total 3rd party poultry resources</i>		-	-	<b>17,075</b>	-	-	<b>11,198</b>
<b>SWINE WASTE TO ENERGY RESOURCES</b>							
██████████	20 years	-	-	-	-	5,323	18,871
<i>Total 3rd party swine resources</i>		-	-	-	-	<b>5,323</b>	<b>18,871</b>
<b>HYDRO ELECTRIC RESOURCES</b>							
██████████	10 years	19,272	19,272	19,272	19,272	19,272	19,272
<i>Total 3rd party hydroelectric resources</i>		<b>19,272</b>	<b>19,272</b>	<b>19,272</b>	<b>19,272</b>	<b>19,272</b>	<b>19,272</b>
<b>TOTAL 3RD PARTY RESOURCES</b>		<b>1,491,380</b>	<b>1,563,549</b>	<b>1,581,127</b>	<b>1,021,288</b>	<b>1,098,783</b>	<b>1,123,783</b>


[END CONFIDENTIAL]



## CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC's Revised Exhibit B of its 2012 REPS Compliance Plan and Duke Energy Progress, LLC's revised pages D-4, D-5 and D-6 and Revised Exhibit A of its 2012 REPS Compliance Plan in Docket No. E-100, Sub 137, has been served by electronic mail, hand delivery or by depositing a copy in the United States mail, postage prepaid to parties of record:

This is the 31<sup>st</sup> day of August, 2016.

By:   
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Associate General Counsel  
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