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October 4, 2018

VIA ELECTRONIC FILING

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Duke Energy Progress, LLC's Request for Approval of Revised
Meter-Related Optional Programs Rider MROP (AMI Opt-Out)
Docket No. E-2, Sub 834**

Dear Ms. Jarvis:

I enclose Duke Energy Progress, LLC's ("DEP" or the "Company") revised Meter-Related Optional Programs Rider MROP for filing and approval by the North Carolina Utilities Commission ("Commission") in connection with the referenced matter. DEP is seeking to revise the Rider to offer a new voluntary program for customers desiring a non-communicating meter that will be read manually each month and to restrict the availability of the TotalMeter program to current participants. Other than Company-specific differences in cost-based charges from those of Duke Energy Carolinas, LLC ("DEC"), DEP's request is consistent with the DEC AMI Opt-Out tariff and implementation plan approved by the Commission in Docket No. E-7, Sub 1115, including the medical opt-out provisions.

In May 2018, DEP began a multi-year deployment of advanced metering infrastructure ("AMI"), which includes deployment of smart meters to its customers. Smart meters not only give customers more information on how they use energy but also provide increased convenience for customers as service connections and disconnections can be performed remotely without the need for a technician to visit their home or business. The Company anticipates the ability to provide customers in the future with increased choices for energy delivery, billing and program offerings, along with enhanced services that are enabled by smart meters.

DEP understands that some customers may have concerns with smart meters. Although the Company's metering hardware complies with all applicable safety and other applicable regulatory requirements, in response to these customer concerns, the Company will offer an option whereby energy usage would not be communicated via radio frequency, and the meter would be manually read by a meter reader visiting the premises. Customers participating in this new service option under Rider MROP would not be able to participate in any current or future offerings enabled by smart meters. The Company proposes to limit participation under this optional service to residential customers served under Residential Service Schedule RES and nonresidential customers served under Small General Service Schedule SGS that don't require a demand meter. This option would also not be available to customers served under a net metering rider.

The Company incurs a higher cost for serving customers selecting this service; therefore, customers requesting the service will be charged an Initial Set-up Fee of \$170 and a Monthly Rate of \$14.75. The Initial Set-Up Fee recovers the incremental cost of configuring and installing the non-communicating meter, customer service to establish the manual meter reading service, meter rerouting cost and a portion of the information technology ("IT") enhancements necessary to support billing the new service. The Monthly Rate recovers the incremental cost to manually read the meter each month and the remainder of the IT programming costs. The new Manually Read Metering paragraph in the attached Rider MROP describes the proposed service option and the associated charges.

DEP used the same cost estimate methodology as was used in deriving the fees for DEC. DEP's costs differ from those of DEC because DEC's rates are based on 2016 costs. Additionally, the number of customers expected to opt-out differ between DEC and DEP, as do labor and contractor rates. Both utilities assumed the same participation rate of 0.1% percent, but because DEC has a larger customer base, the billing system cost was spread over a greater number of participants, thereby resulting in a lower overall rate.

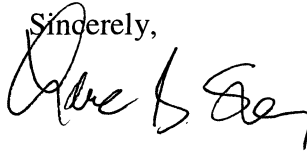
Consistent with the Commission orders in Docket No. E-7, Sub 1115, DEP customers will be able to pay the initial set-up fee over six billing cycles, and DEP will waive the fees for customers who provide the Company with a notarized statement from a medical physician licensed by the North Carolina Medical Board that they must avoid exposure to radio frequency emissions to the extent possible to protect their health.

The Company will notify individual customers of the meter exchange to a smart meter prior to installation. Until Commission approval and the Company's implementation of this new service option, customers objecting to the use of a communicating smart meter are being temporarily bypassed. Upon approval of the rider, these bypassed customers and any customers objecting to the installation of a smart meter will be advised of this new service option and its associated charges; upon the customer's agreement, a communicating smart meter will not be installed. Due to the significant nature of the IT changes required in the customer billing system to effectuate this new service, charges associated with manual meter reading service would not be available in the billing system until the first quarter of 2019. A permanent non-communicating meter will be installed, and the new charges will be billed once IT programming to support billing this service is complete. Consistent with Commission approval, the Company will

continue to add customers to the bypass list until the AMI opt-out program is functionally available on April 1, 2019.

The Company is also seeking to restrict the availability of the TotalMeter program to existing participants. TotalMeter is a voluntary program that allows the Company's meter to be read by wireless telephone communication for a monthly rate. Historically, this service was desired by customers that prefer not to have Company agents on their premises each month or that desire a specific meter reading schedule. There are currently 15 NC TotalMeter participants. Similar services may be available at no charge upon deployment of AMI metering; therefore, restricting future availability will aid in the transition to AMI metering.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

Enclosure

cc: Parties of Record

METER-RELATED OPTIONAL PROGRAMS RIDER MROP-13

AVAILABILITY

These programs are available upon request and on a voluntary basis to those customers as described below, subject to the availability of appropriate metering and meter-related equipment.

I. TOTALMETER PROGRAM

Metering equipment to allow remote automated meter reading by Company will be provided upon execution of an application for TotalMeter. The application describes the conditions of service, states all charges, and provides for a termination charge should the TotalMeter option be discontinued prior to 24 consecutive months of service. Customer receiving the TotalMeter option may select a desired meter-reading day. Monthly rates and other charges related to the TotalMeter are as follows:

Monthly Rate for TotalMeter

Option 1: Customer-supplied suitable telephone communications line ¹	\$ 3.00
Option 2: Company-supplied wireless telephone communications circuit ²	\$13.20

Charge for Customer-requested termination of TotalMeter	
Option prior to 24 consecutive months of service	\$50.00

¹ Option 1 is not available to new applicants on and after October 1, 2013. Existing participants may continue under this option until such time that the metering equipment requires replacement.

² Option 2 is not available to new applicants on and after (*insert approval date*). Existing participants may continue under this option until such time that the metering equipment requires replacement.

TotalMeter charges shall not apply when Company, at its option, determines that remote automated meter reading is necessary for Company's own use. Receipt of the TotalMeter option shall in no way restrict or otherwise limit Company's right of ingress and egress to read meters and inspect, maintain, repair and replace the meters and other facilities installed to serve Customer whenever necessary.

II. ENERGY PROFILER ONLINE

The Energy Profiler Online (EPO) program is available to any non-residential customer with a registered or contract demand of 30 kW or greater. EPO is an Internet-based program permitting Customer access to historic meter data from any internet-capable location. Access to meter data is both identification/name and password restricted. Monthly rates and other charges related to EPO are as follows:

Monthly Rate for EPO

Rate for totalized meter data only (updated monthly) ³	\$20.00 per totalized account
Rate for meter data per individual meter (updated each business day)	\$20.00 per meter

Set-up fee per meter	\$85.00
Set-up fee for totalized meter data only	\$85.00

³ The rate applicable for totalized meter data only is not available to new applicants on and after July 1, 2017.

Provision of EPO requires that the standard meter, as determined solely by Company based upon the Customer's electrical requirement, have the capability of recording electrical consumption information on

a 15-minute interval basis. Additional monthly rates and other charges, as described in Section III below, will apply if the standard meter based upon customer's electrical requirement does not have interval data capability.

III. MANUALLY READ METERING (MRM)

Customers served under either Schedule RES or Schedule SGS only, without a demand meter, may request metering that either does not utilize radio frequency communications to transmit data, or is otherwise required to be read manually. This service is not available when service is requested in conjunction with any net metering rider. At the Company's option, meters to be read manually may be either an advanced meter with the radio frequency communication capability disabled or other non-communicating meter. The meter manufacturer and model chosen to service the customer's premise are at the discretion of the Company and are subject to change at the Company's option, at any time. Customers choosing this option are responsible for the payment of the rates shown below and will not be eligible for any current or future services or offerings that require the use of an advanced or other communicating meter.

Monthly Rate for MRM Service⁴:

- | | |
|------------------------------------------------------------------------------|----------|
| 1. Initial Set-up Fee | \$170.00 |
| 2. Monthly Rate For MRM | \$14.75 |
| 3. Early Termination Charge (Prior to 12 consecutive months of service only) | \$50.00 |

Upon request, the one-time Initial Set-up Fee may be paid in six installments included as a part of the Customer's first six monthly electric service bills following installation of the manually read meter. The contract term shall be a minimum of 12 months and may be terminated by either party with thirty (30) days written notice. The Company may refuse to provide service under this option under the following conditions: (1) the Customer has a history of meter tampering or unauthorized use of electricity at the current or any prior location, (2) provision of such service creates a safety hazard to consumers or their premises, the public or the electric utility's personnel or facilities, or (3) the customer fails to provide the Company satisfactory access to the Customer's facilities for the purpose of obtaining meter readings or maintaining its equipment.

⁴ The Initial Set-up Fee and Monthly Rate shall be waived and not apply for customers providing a notarized statement from a medical physician fully licensed by the North Carolina Medical Board stating that the customer must avoid exposure to radio frequency emissions, to the extent possible, to protect their health. All such statements shall be retained in Company records on a secure and confidential basis. The Company will provide the customer with a medical release form, to identify general enrollment information, and a physician verification statement. At the physician's option, a comparable physician verification statement may be submitted.

IV. CUSTOMER REQUESTS INSTALLATION OF NON-STANDARD METERING

Company, in its sole determination, shall establish appropriate meter standards based upon Customer's electrical requirement. If a non-residential customer desires additional meter services that require the installation of a non-standard meter, Company will comply for the following monthly rate and other charges:

Monthly Rate for non-standard meter with interval data capability \$0.33 per month

The following fees apply when the non-standard meter will not be remotely read:

Meter Set-up Fee	\$15.00
Meter Exchange Fee	\$77.00

A charge shall apply if Customer requests termination prior to 24 consecutive months of operation of a non-standard meter option that provides interval data. The charge shall equal the monthly rate times the sum of 24 minus the number of months the non-standard meter service has been received, not to exceed 24 months.

GENERAL

Upon appropriate notice to Customer, Company reserves the right to suspend and/or terminate any or all of these meter-related programs at any time if providing the requested program is not feasible. Company does not guarantee continuous provision of these meter-related programs but shall use reasonable diligence at all times to provide the program without interruption and having used reasonable diligence shall not be liable to Customer for damages, for failure in, or for interruptions or suspension of the same.

Service rendered under this Rider is subject to the provisions of the Service Regulations of the Company on file with the state regulatory commission. The provisions of this Rider are subject to change upon approval of the North Carolina Utilities Commission.

Supersedes Meter-Related Optional Programs Rider MROP-12
Effective on and after _____
NCUC Docket No. E-2, Sub 834

CERTIFICATE OF SERVICE

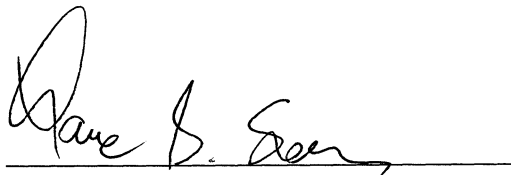
I certify that a copy of Duke Energy Progress, LLC's Request for Approval of Revised Meter-Related Optional Programs Rider MROP in Docket No. E-2, Sub 834, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to the following parties of record:

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This the 4th day of October, 2018.



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