McGuireWoods LLP 501 Fayetteville St. Suite 500 Raleigh, NC 27601 Phone: 919.755.6600 Fax: 919.755.6699 www.mcguirewoods.com

F. Brett Breitschwerdt



bbreitschwerdt@mcguirewoods.c

June 16, 2020

## VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell, Chief Clerk North Carolina Utilities Commission Dobbs Building 430 North Salisbury Street Raleigh, North Carolina 27603

> Duke Energy Progress, LLC's Supplemental Exhibit in Response to Re: Commission Order Docket No. E-2, Sub 1220

Dear Ms. Campbell:

In response to the North Carolina Utilities Commission's ("Commission") June 11, 2020 Order Granting Motion to Excuse Witness and Requiring Witness to Appear at Hearing to Address Certain Issues ("Order"), enclosed for filing in the above-referenced docket please find Duke Energy Progress, LLC's ("Duke" or "the Company") Confidential K. Jennings / Holmes Exhibit 7 ("Exhibit").

The Order directed Duke to ensure that the Company produces a witness at the hearing that can "address general questions about DEP's customs, practices, general outcomes and results, as well as comparability of projects in the queue; and specifically be able to provide a comparison of how the increase in the System Impact Study and Facilities Study estimates for the interconnection and System Upgrade costs provided to Complainant compare to any increases in these estimates provided to other interconnection customers in DEP's interconnection queue during the same time period, and provide an explanation for the reasons for any disparities between the Complainant and other interconnection customers similarly situated."

Duke witness Ken Jennings will be prepared to answer general questions regarding the issues presented in the Order. In further response to the Commission's Order, Duke is also pre-filing the Exhibit presenting a comparison of the increase in the System Impact Study and Facilities Study cost estimates provided to other similarly situated Interconnection Customers in Duke's interconnection queue during the same time period. The 27 projects identified in the Exhibit as similarly situated are a subset of the 71 projects identified in pre-filed Confidential Exhibit CEB-21.

Ms. Kimberley A. Campbell, Chief Clerk June 16, 2020 Page 2

The Exhibit contains confidential information, which qualifies as "trade secrets" under N.C.G.S. § 66-152(3). Pursuant to N.C.G.S. § 132-1.2, the Company requests that the Exhibit marked "Confidential" be protected from public disclosure, and is filing the Exhibit contemporaneously under seal. The Company will make the information available to other parties pursuant to an appropriate nondisclosure agreement.

If you have any questions, please do not hesitate to contact me. Thank you for your assistance with this matter.

Very truly yours,

/s/E. Brett Breitschwerdt

EBB:kjg

Enclosure

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing <u>Confidential K. Jennings / Holmes</u>

<u>Exhibit 7</u>, as filed in Docket No. E-2, Sub 1220, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 16<sup>th</sup> day of June, 2020.

/s/E. Brett Breitschwerdt

E. Brett Breitschwerdt McGuireWoods LLP 501 Fayetteville Street, Suite 500 PO Box 27507 (27611) Raleigh, North Carolina 27601 Telephone: (919) 755-6563 bbreitschwerdt@mcguirewoods.com

Attorney for Duke Energy Progress, LLC