

# SOUTHERN ENVIRONMENTAL LAW CENTER

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September 20, 2019

Kim Campbell  
Chief Clerk  
North Carolina Utilities Commission  
430 North Salisbury Street  
Dobbs Building  
Raleigh, NC 27603-5918

**Re: Application of Duke Energy Progress, LLC for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider, NCUC Docket No. Docket No. E2, Sub 1206**

Dear Kim Campbell:

Enclosed for filing in the referenced docket is a late-filed exhibit from Forest Bradley-Wright on behalf of the North Carolina Justice Center, North Carolina Housing Coalition, and Southern Alliance for Clean Energy. This late-filed exhibit provides a correction noted at the September 9, 2019 hearing to Mr. Bradley-Wright's testimony and response to a question from Commissioner Clodfelter.

Please do not hesitate to request any additional follow up information.

Sincerely,



David L. Neal  
Senior Attorney

### **Late-Filed Exhibit of Forest Bradley Wright**

#### **I. Corrected Hyperlink and Full Citation**

As noted during my testimony during the evidentiary hearing on September 9, 2019, I am providing a corrected hyperlink and full citation to the publication and data reporting resources that are made available by the Lawrence Berkeley National Laboratory and referenced on page 37 of my pre-filed direct testimony:

Gregory Rybka, Ian Hoffman, Charles Goldman, Lisa Schwartz, *Flexible and Consistent Reporting for Energy Efficiency Programs: Introducing a New Tool for Reporting Spending and Savings for Programs Funded by Utility Customers*, LBNL-1003879 (Nov. 2015)  
(<https://emp.lbl.gov/publications/flexible-and-consistent-reporting>)

#### **II. Response to Question from Commissioner Clodfelter**

In response to a question from Commissioner Clodfelter at the hearing regarding utilities commissions from other states that have investigated energy efficiency in connection with distribution planning, I noted an Arkansas Public Service Commission docket concerning distributed energy resources (“DERs”), including energy efficiency. The docket in question is: *In The Matter of an Investigation of Policies Related to Distributed Energy Resources*, Arkansas Public Service Commission, Docket No. 16-028-U.

As it relates to Commissioner Clodfelter’s question, the Arkansas Commission is investigating the steps that would be needed to give utilities and third-party DER providers “visibility into the distribution system” so as to, among other things, enhance planning for DER deployments and “identify and optimize the development of non-wires alternatives to utility generation, transmission, and distribution investments.” Arkansas Public Service Commission Docket No. 16-028-U, Order No. 10, at pp. 8-9 (July 2018) ([http://www.apscservices.info/pdf/16/16-028-U\\_118\\_1.pdf](http://www.apscservices.info/pdf/16/16-028-U_118_1.pdf)).

In addition, the Arkansas Commission ordered that distribution planning be covered by this overall investigation:

**E) Distribution System Planning and Integrated Resource Planning Matters:** Gaining a better understanding by the Commission and Parties of utilities’ existing distribution system planning processes:

- a) the current and planned ability of utilities to attain visibility into the distribution system, perform DER

hosting capacity analysis and load forecasting, and to provide heat maps for customers and third party DER providers, including how data generated from AMI can be used to better inform utility planning and operations;

- b) integration of information from interconnection requests from third-party DER providers; and
- c) necessary infrastructure investments to integrate DERs so as to enable these resources to participate in retail and/ or wholesale markets.

*Id.* at p. 9. Note that the Public Service Commission explicitly defined DERs to include “energy efficiency resources (EE); demand response (DR); smart thermostats and controls” in addition to renewable resources, distributed generation, and controllable water heaters, among other things. *Id.* at N. 1.

I spoke with Arkansas Public Service Commission staff member Wally Nixon, who confirmed that energy efficiency and transmission and distribution planning are an important part of this investigation, which is ongoing.

CERTIFICATE OF SERVICE

I certify that the persons on the service list have been served with the foregoing late-filed exhibit on behalf of the North Carolina Justice Center, North Carolina Housing Coalition, and Southern Alliance for Clean Energy either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 20<sup>th</sup> day of September, 2019.

/s David L. Neal \_\_\_\_\_

David L. Neal