

## DOCKET NO. E-100, SUB 151

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	REPLY COMMENTS OF THE
Proceeding to Select the	)	PUBLIC STAFF
Independent Administrator	)	
of the CPRE Program	)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and in accordance with the North Carolina Utilities Commission's ("Commission") *Order Establishing Proceeding to Select the Independent Administrator of the CPRE Program* issued on November 21, 2017, respectfully submits the following reply comments.

1. On December 8, 2017, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, "Duke") filed Initial Comments and Independent Administrator Recommendation ("Initial Comments"). In Duke's Initial Comments, Duke requested that the Commission approve Accion Group, LLC ("Accion") as the Independent Administrator for the Competitive Procurement of Renewable Energy Program ("CPRE Program").

2. The Public Staff reviewed Duke's Initial Comments and does not take exception with the process followed by Duke in identifying and evaluating candidate firms with experience monitoring and supporting competitive procurement programs for electric utilities. In addition, the Public Staff is satisfied with Duke's due diligence in evaluating Accion's qualifications and experience.

3. The Public Staff did not conduct an extensive search for prospective firms to serve as the Independent Administrator for the CPRE Program, but did

conduct a high-level survey of firms that provide these types of services. The Public Staff was previously familiar with Accion's work as an independent evaluator for the Georgia Public Service Commission for Georgia Power Company's Advanced Solar Initiative and Renewable Energy Development Initiative ("REDI") Program, and also spoke with Georgia Public Service Commission staff regarding their experience and satisfaction with the services performed by Accion. The Public Staff also met with Accion on two occasions to discuss their qualifications and experience.

4. The Public Staff is of the opinion that Accion has the experience and resources to meet the requirements of the Independent Administrator for the CPRE Program in North Carolina and does not object to Duke's recommendation.

5. While the Public Staff believes the Commission has sufficient information necessary to select an Independent Administrator, it may be informative for the Commission and other parties for the Commission to request Accion or other parties being considered to provide a presentation of their skills and qualifications, answer any remaining questions the Commission may have, and also provide additional information regarding their ability to serve as the Independent Administrator in North Carolina that may be useful for the Commission's consideration.

Respectfully submitted this the 21<sup>st</sup> day of December, 2017.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

David. T. Drooz  
Chief Counsel

Electronically submitted  
s/ Tim R. Dodge  
Staff Attorney

4326 Mail Service Center  
Raleigh, North Carolina 27699-4300  
Telephone: (919) 733-6110  
[tim.dodge@psncuc.nc.gov](mailto:tim.dodge@psncuc.nc.gov)

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing reply comments on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party

This the 21<sup>st</sup> day of December, 2017.

Electronically submitted  
s/ Tim R. Dodge