

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1167
DOCKET NO. E-7, SUB 1166**

In the Matter of:)	
Application of Duke Energy Progress, LLC)	NCSEA’S RESPONSE TO
and Duke Energy Carolinas, LLC)	DUKE ENERGY
Requesting Approval of Solar Rebate)	PROGRESS, LLC AND
Program Pursuant to N.C. Gen. Stat. § 62-)	DUKE ENERGY
155(f))	CAROLINAS, LLC’S
)	APPLICATION FOR
)	APPROVAL TO REVISE
)	SOLAR REBATE
)	PROGRAM

NCSEA’S RESPONSE TO DUKE ENERGY PROGRESS, LLC AND DUKE ENERGY CAROLINAS, LLC’S APPLICATION FOR APPROVAL TO REVISE SOLAR REBATE PROGRAM

NOW COMES the North Carolina Sustainable Energy Association (“NCSEA”) and hereby responds to Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC’s (“DEC”) (DEP and DEC, collectively, “Duke”) Application to Revise Solar Rebate Program (“Application”) filed with the North Carolina Utilities Commission (“Commission”) on March 3, 2021. NCSEA requests that the Commission reject the Application. In support of this position, NCSEA submits the following.

Despite widespread installer interest in changing the program and general disapproval with the last few rebate window rollouts, there is no consensus among the solar companies in NCSEA’s membership on how the solar rebate program should be revised. From NCSEA’s perspective, the January 2021 rollout caused more issues for consumers than any prior rollout since the beginning of the program. There are a range of issues, but the biggest sole issue that the NCSEA solar installer members face is heavy demand outweighing supply. To that end, NCSEA has advised its member solar installer companies

not to market or otherwise “sell” distributed solar by mentioning the rebate program to potential customers. Success in the rebate program – namely clicking the computer mouse in a timely fashion and being processed before the commercial and residential tranches are gone – is too uncertain. By NCSEA’s estimate, the January 2021 window rebate “success” rate for commercial and residential customers was less than one in four.

NCSEA appreciates Duke’s willingness to attempt to collaborate on “fixing” this program. NCSEA agrees with the general principle that the program, as statutorily tailored and interpreted by this Commission, will never meet demand. NCSEA believes that consumer expectations should be reset and positioning the program as a lottery rather than “first come, first serve” will do just that. “First come, first serve” implies that a customer who shows up when the application window opens and applies within reasonable time will have a chance at a rebate, when we now know that is not the case. Therefore, NCSEA does not generally oppose the implementation of a lottery system in the solar rebate program and believes that this realignment will more truly match what consumer expectations should be when they attempt to reserve a rebate.

However, NCSEA member installers came to clear consensus on one thing: they do not want the changes recently proposed or outlined in this docket, as in the lottery or the previously-discussed tiered system, to apply to the July 2021 rebate window. NCSEA’s member installers do not oppose a lottery system beginning in January 2022. While the current system is flawed, the NCSEA member installers are concerned that they will not be able to adequately train their staff for another marked change to the rebate program. NCSEA is also not confident in the ability to educate the public about these changes.

Getting to the minutiae of Duke’s lottery proposal, NCSEA could not find consensus among its members on details of the proposal (aside from opposing the changes being implemented for the July 2021 rollout window). NCSEA’s member installers could not come to a consensus on Duke’s proposed timeline or the underlying software used and technology proposed by Duke,¹ the elimination of the 90-day rule and the October 6, 2020 retroactive installation deadline for lottery eligibility,² and the timeframe to install after receiving the lottery-awarded rebate.³ NCSEA’s member installers were generally in agreement that the 90-day rule may not make sense within a lottery structure, but were not sure the most equitable way to “limit” applications. The member installers differed on (1) whether the program should be eligible to anyone who has installed solar since the implementation of this program, (2) whether to make a “clean break” and not make the changes retroactive, or (3) fall somewhere else on the relative timeline with regard to rebate lottery eligibility.

CONCLUSION

NCSEA agrees with Duke that the solar rebate program needs to be adjusted and, for the reasons set forth herein, NCSEA does not conceptually oppose a lottery program. NCSEA’s member installers could not come to a consensus in how a lottery program should be rolled out, but they did agree that the lottery program should not be implemented until January 2022 to allow sufficient time for training and consumer education. For these reasons, NCSEA requests that the Commission deny Duke’s Application as to the July 2021 rebate window.

¹ See Application, pp. 5-6.

² *Id.* at 8-10.

³ *Id.* at 10-11.

Respectfully submitted, this the 10th day of March, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 10th day of March, 2021.

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