

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 157

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
2019 Biennial Integrated Resource)
Plan Updates and Related 2019 REPS) REPORT ON COMPLIANCE WITH
Compliance Plans) COMMISSION RULE R8-61

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and submits the following report. On August 29, 2019, Dominion Energy North Carolina (DENC) filed its total system 2019 Integrated Resource Plan (IRP) as an update report pursuant to Commission Rule R8-60(h)(2).¹ On September 3, 2019, Duke Energy Progress, LLC (DEP), and Duke Energy Carolinas, LLC (DEC), filed their 2019 IRP Update Reports.² Pursuant to Commission Rule R8-60(l), and the Commission’s October 28, 2019, *Order Granting Motion to File Combined Report*, the Public Staff submits this report as to whether DENC, DEP, and DEC’s (collectively, “the utilities”) update reports meet the requirements of Commission Rule R8-60(j). The Public Staff has reviewed the utilities’ IRPs to ensure that each contains the following items:

¹ DENC updated this filing on October 29, 2019.

² The Public Staff notes that on September 17, 2019, Duke Energy announced an updated climate strategy with a near-term goal of cutting its carbon dioxide emissions by at least 50% by 2030 and reaching net-zero carbon emissions by 2050. See press release at: <https://news.duke-energy.com/releases/duke-energy-aims-to-achieve-net-zero-carbon-emissions-by-2050>. In addition, Duke Energy North Carolina President Stephen De May said the 2019 IRP Updates don’t reflect the new goal, and that the 2020 IRPs will reflect the changes described in the announcement. <https://www.wral.com/duke-energy-net-zero-carbon-emissions-by-2050/18640706/>

- An updated 15-year forecast of native load requirements (including any off-system obligations approved for native load treatment by the Commission) and other system capacity or firm energy obligations extending through at least one summer or winter peak (other system obligations); supply-side (including owned/leased generation capacity and firm purchased power arrangements) and demand-side resources expected to satisfy those loads; and the reserve margin thus produced;
- A summary of any significant amendment or revisions to the most recently filed biennial report, including amendments or revisions to the type and size of resources identified, as applicable;
- A short-term action plan that discusses those specific actions currently being taken by the utility to implement the activities chosen as appropriate per the applicable biennial and update reports;
- The utility's Renewable Energy and Energy Efficiency Portfolio Standard (REPS) compliance plan pursuant to Rule R8-67(b); and
- Data and tables for the planning horizon that provide the following:
 - Forecasts of load, supply-side resources, and demand-side resources, including a description of the methods, models, and assumptions used by the utility to prepare its peak load

- (MW) and energy sales (MWh) forecasts and the variables used in the models;
- The utility's forecast for at least a 15-year period, including peak loads for summer and winter seasons of each year, annual energy forecasts, reserve margins, and load duration curves, with and without projected supply or demand-side resource additions;
 - Where future supply-side resources are required, a description of the type of capacity/resource (MW rating, fuel source, base, intermediate, or peaking) that the utility proposes to sue to address the forecasted need;
 - A list of existing units in service, with the following information for each unit for a 15-year period: type of fuel(s) used; type of unit (e.g., base, intermediate, or peaking); location of each existing unit; units to be retired from service with location, capacity and expected date of retirement from the system; units for which there are specific plans for life extension, refurbishment or upgrading and the expected (or actual) date removed from service, general location, capacity rating upon return to service, expected return to service date, and general description of work to be performed; and other changes to existing generating units that are expected to increase or decrease generation

- capability of the unit in question by an amount that is plus or minus 10%, or 10 MW, whichever is greater;
- A list of planned generation additions, the rationale as to why each listed generation addition was selected, and a 15-year projection of the type of fuel(s) used; type of unit (e.g. MW rating, baseload, intermediate, peaking); location of each planned unit to the extent such location has been determined; and summaries of the analyses supporting any new generation additions included in its 15-year forecast, including its designation as base, intermediate, or peaking capacity;
 - An updated list of all non-utility electric generating facilities in its service areas, including customer-owned and stand-by generating facilities, including the facility name, location, primary fuel type, and capacity (including its designation as base, intermediate, or peaking capacity). The utility shall also indicate which facilities are included in its total supply of resources; and
 - To the extent not covered by the previous requirements: the utility's load forecast adjusted for the impacts of any new energy efficiency programs; existing generating capacity with planned additions, uprates, derates, and retirements, planned purchase contracts, undesignated future resources

identified by type of generation and MW rating; renewable capacity, demand-side management capacity, and any resource gap; cumulative resource additions necessary to meet load obligation, and reserve margins; and projections of load, capacity, and reserves for both the summer and winter periods.

Based on its review, the Public Staff has determined the utilities' update reports meet the requirement of the rule. The Public Staff's recommendation that the Commission find that the utilities' IRP updates comply with the requirements of R8-60(k) should not be construed to indicate that the Public Staff endorses any input or assumption utilized by any of the utilities in the development of their IRP updates or any forecast or plan. The Public Staff's recommendation simply indicates that the utilities have complied with all of the requirements of the rule for the purposes of the update year, and that the information utilized by the utilities appear to be reasonable for planning purposes.

Respectfully submitted, this the 7th day of November, 2019.

PUBLIC STAFF
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CERTIFICATE OF SERVICE

I certify that a copy of these Comments has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 7th day of November, 2019.

Electronically submitted
s/ Lucy Edmondson