



**NORTH CAROLINA  
PUBLIC STAFF  
UTILITIES COMMISSION**

January 6, 2021

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

Re: Docket Nos. E-2, Sub 1262 and E-7, Sub 1243  
Joint Petition for Issuance of Storm Recovery Financing Orders

Dear Ms. Campbell:

Attached for filing in the above-referenced dockets are corrections to the following Public Staff testimony:

1. Direct Testimony of Paul R. Sutherland, Saber Partners, LLC;
2. Direct Testimony of Steven Heller, Analytical Aid, Consultant to Saber Partners, LLC;
3. Direct Testimony of Joseph S. Fichera, Saber Partners, LLC; and
4. Joint Testimony of Michael C. Maness and Michelle M. Boswell, Public Staff – North Carolina Utilities Commission.

By copy of this letter, I am forwarding a copy to all parties of record by electronic delivery.

Sincerely,

Electronically submitted  
s/ William E. H. Creech  
Staff Attorney  
[zeke.creech@psncuc.nc.gov](mailto:zeke.creech@psncuc.nc.gov)

**Attachments**

Executive Director  
(919) 733-2435

Accounting  
(919) 733-4279

Consumer Services  
(919) 733-9277

Economic Research  
(919) 733-2267

Energy  
(919) 733-2267

Legal  
(919) 733-6110

Transportation  
(919) 733-7766

Water/Telephone  
(919) 733-5610

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1262

DOCKET NO. E-7, SUB 1243

In the Matter of	)	
Joint Petition of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC for Issuance of Storm Recovery Financing Orders	)	CORRECTIONS TO THE DIRECT TESTIMONY OF PAUL R. SUTHERLAND SABER PARTNERS, LLC
	)	
	)	CORRECTIONS TO THE DIRECT TESTIMONY OF STEVEN HELLER ANALYTICAL AID CONSULTANT TO SABER PARTNERS, LLC
	)	
	)	CORRECTIONS TO THE DIRECT TESTIMONY OF JOSEPH S. FICHERA SABER PARTNERS, LLC
	)	
	)	CORRECTIONS TO THE JOINT TESTIMONY OF MICHAEL C. MANESS AND MICHELLE M. BOSWELL PUBLIC STAFF – NORTH CAROLINA UTILITIES COMMISSION

**CORRECTIONS TO THE DIRECT TESTIMONY OF PAUL R. SUTHERLAND**

Mr. Sutherland’s direct testimony should be corrected as follows:

1. On Page 17, Line 2, the words “23 million” should be changed to “\$17 million (nominally \$23 million)”.

**CORRECTIONS TO THE DIRECT TESTIMONY OF STEVEN HELLER**

Mr. Heller’s direct testimony should be corrected as follows:

1. On Page 4, Line 11, “2006” should be changed to “2005”.

2. On Page 4, after Line 11, the following additional new line should be added: “**2005** \$1.851 billion for CenterPoint Energy (CenterPoint Energy Transition Bond Company II, LLC)”.

**CORRECTIONS TO THE DIRECT TESTIMONY  
OF JOSEPH S. FICHERA**

Mr. Fichera’s direct testimony should be corrected as follows:

1. On Page 5, Line 9, the word “Wisconsin” should be deleted.
2. On Page 13, Line 3, change “20” to “23”.
3. On Page 29, Line 10, delete the words “Following a” and substitute “Prior to a potentially”.
4. On Page 51, Line 4, change “are called” to “should be treated as”.
5. On Page 54, Lines 19 and 20, change “and California -- and prospectively Wisconsin --” to “California and Louisiana”.
6. On Page 55, Line 5, change “2019” to “2020”.
7. On Page 66, Line 22, after “West Virginia” add “, Louisiana”.

**CORRECTIONS TO THE JOINT TESTIMONY  
OF MICHAEL C. MANESS AND MICHELLE M. BOSWELL**

The Joint Testimony of Mr. Maness and Ms. Boswell should be corrected as follows:

1. On Pages 2 through 29, the subdocket number “1252” appearing in the page footer should be replaced by the subdocket number “1262.”
2. On Page 13, Lines 20 and 21, the phrase “Companies acknowledge that” should be deleted.
3. On Page 14, Line 1, the phrase “expected to exceed” should be replaced by the phrase “likely to differ from.”
4. On Page 14, Lines 6 and 7, the phrase “in fact exceed” should be replaced by the word “and.”
5. On Page 14, Line 8, the phrase “, in the present filing” should be deleted.
6. On Page 15, Line 8, following the comma after the word “process,” the following phrase should be added: “adjusted if appropriate for income taxes and accrued carrying costs at the Companies’ respective net-of-tax WACC,”.

7. On Page 16, Line 18, following the word “service,” the following phrase should be added: “, adjusted if appropriate for income taxes and accrued carrying costs at the Companies’ respective net-of-tax WACC.”
8. On Page 17, Line 16, and on Page 20, Line 6, the abbreviation “SEPs” should be replaced by the abbreviation “SPEs.”
9. On Page 19, Line 1, the identifier “Appendix C” should be replaced by the identifier “Exhibits B and C.”