

Camal O. Robinson Associate General Counsel

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January 25, 2021

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell Office of the Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4335

Re: Notice of Billing Compliance Procedure and Supporting Affidavit and

Exhibits of Jonathan Byrd

Docket Nos. E-7, Sub 1243 and E-2, Sub 1262

Dear Ms. Campbell:

Duke Energy Progress, LLC ("DEP" or the "Company") hereby notifies the North Carolina Utilities Commission (the "Commission") of its planned compliance with N.C. Gen. Stat. § 62-172(d) through a temporary, alternative procedure to provide customers with the information needed to calculate the rate and total amount charged related to the issuance of storm recovery bonds approved by the Commission for DEP in this proceeding. In support of the planned procedure, the Company is enclosing the supporting affidavit and exhibits of Company witness Jonathan L. Byrd, Director of Southeast Pricing & Regulatory Solutions.

In this proceeding, DEP and Duke Energy Carolinas, LLC ("DEC") (collectively, the "Companies") have jointly proposed to finance their storm recovery costs through the issuance of storm recovery bonds and the imposition and collection of storm recovery charges. Provided the Commission grants the Companies' petition for approval of proposed financing orders, the Companies have targeted June 1, 2021, as the expected issuance date for the bonds. The Companies have further proposed to implement the storm recovery charge related to their series of storm recovery bonds beginning with the first billing cycle for the month following the issuance of storm recovery bonds approved by the Commission. Assuming a June 1, 2021 issuance date, the storm recovery charge would be implemented on July 1, 2021.

N.C. Gen. Stat. § 62-172(d)(2) requires the Company to "[i]nclude the storm recovery charge on each customer's bill as a separate line item and include both the rate and the amount of the charge on each bill." However, DEP's legacy billing system, Customer Information Management ("CIM"), is not currently technologically capable of

providing customers line item bill charges. Moreover, it is not cost-effective or guaranteed that CIM can be properly upgraded in the allotted timeframe to provide customers a line item storm recovery charge. As the Commission is aware, DEP is currently in the process of implementing a new customer billing system, Customer Connect. For DEP, Customer Connect is expected to be implemented in November 2021, and, at that time, will allow DEP the complete ability to include the storm recovery charge as a separate line item on each customer bill, in accordance with N.C. Gen. Stat. § 62-172(d)(2). Therefore, and as detailed more fully in Mr. Byrd's attached affidavit, DEP proposes to implement a temporary and alternative billing procedure to comply with N.C. Gen. Stat. § 62-172(d)(2) to bridge the period between when the storm recovery charge is implemented and the Company's Customer Connect system is deployed.

As discussed in Mr. Byrd's affidavit, DEP's billing compliance solution is to provide customers with a bill insert for the interim period describing the storm recovery charge as a separate charge from the customer's overall, main bill, that will otherwise comply with, and include the requirements of N.C. Gen. Stat. § 62-172(d).² The bill insert, as well as the Company's website, will also include a message directing customers to an online calculator that allows customers to calculate their specific storm recovery charge, or contact DEP via telephone for assistance in determining such charge. DEP will further provide a general notice to all customers regarding the storm recovery charge on its Company website. In implementing these procedures, DEP will most efficiently and cost-effectively meet the intent of N.C. Gen. Stat. § 62-172(d)(2) by providing customers a separate calculation of their storm recovery charges through and until Customer Connect is implemented and line item billing feasible for DEP.

DEP has discussed its billing compliance procedure with the Public Staff and CIGFUR II, and has received authority from the Public Staff and CIGFUR II to represent that they do not oppose the Company's planned billing procedure. In support of this notification, DEP encloses the following items:

- The Affidavit of Jonathan Byrd
- Byrd Attachment 1: Proposed DEP Storm Recovery Charge Bill Insert
- Byrd Attachment 2: Mock-up of storm recovery charge calculator landing page (Illustrative Example Only)
- Byrd Attachment 3: A sample bill once Customer Connect is deployed

¹ For DEC, Customer Connect is expected to be deployed in April 2021. Accordingly, assuming a June 1 issuance date, DEC will have the technological capability to show the storm recovery charge as a separate line item once the storm recovery charge is imposed.

² N.C. Gen. Stat. § 62-172(d)(1) requires bills to "[e]xplicitly reflect that a portion of the charges on such bill represent[] storm recovery charges approved in a financing order issued to the public utility and, if the storm recovery property has been transferred to an assignee, must include a statement to the effect that the assignee is the owner of the rights to storm recovery charges and that the public utility or other entity, if applicable, is acting as a collection agent or servicer for the assignee...."

Ms. Kimberley A. Campbell January 25, 2021 Page 3

Please feel free to contact me with any questions or concerns, and thank you for your assistance in this matter.

Sincerely,

Camal O. Robinson

Enclosures

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 1262 DOCKET NO. E-7, SUB 1243

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Joint Petition of Duke Energy)	
Carolinas, LLC and Duke Energy)	
Progress, LLC for Issuance of Storm)	AFFIDAVIT OF JONATHAN BYRD
Recovery Financing Orders)	
)	
)	

- I, JONATHAN BYRD, first being duly sworn, do depose and state as follows:
- 1. I am the Director, Southeast Pricing & Regulatory Solutions for Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP", and together with DEC, the "Companies"), and Duke Energy Florida, LLC. My business address is 550 South Tryon Street, Charlotte, North Carolina. I previously filed direct testimony in this proceeding on October 26, 2020.
- 2. The purpose of this affidavit is to explain how DEP will comply with the statutory billing requirements provided in N.C. Gen. Stat. § 62-172(d) prior to the implementation of DEP's new billing system, Customer Connect, planned for November 2021.
- 3. N.C. Gen. Stat. § 62-172(d) requires that a public utility that has obtained a financing order and caused storm recover bonds to be issued to:
 - (1) Explicitly reflect that a portion of the charges on such bill represents storm recovery charges approved in a financing order issued to the public utility and, if the storm recovery property has been transferred to an assignee, must include a statement to the effect that the assignee is the owner of the rights to storm recovery charges and that the public utility or other entity, if applicable, is acting as a collection agent or servicer for the assignee. The tariff applicable to customers must indicate the storm recovery charge and the ownership of the charge.

- (2) Include the storm recovery charge on each customer's bill as a separate line item and include both the rate and the amount of the charge on each bill.
- 4. The Companies' Joint Petition proposes a bond issuance date of June 1, 2021¹, and explains how in order to synchronize the collection of storm recovery charges with the first payment on the storm recovery bonds, the tariffs for DEC and DEP that apply the storm recovery charges will become effective as of the date of issuance of the storm recovery bonds.²
- 5. Accordingly, under the current timeline, DEP will begin billing customers for the storm recovery charge beginning July 1, 2021, or approximately four months prior to implementation of DEP's new billing system Customer Connect planned for November 2021.
- 6. DEP's current billing system, Customer Information Management or "CIM", that DEP will utilize to bill customers for the storm recovery charge prior to implementation of Customer Connect is not specifically capable of displaying for each customer a detailed bill with individual line item charges based on kWh usage. For example, rider charges such as fuel, demand-side management and energy efficiency, etc. are included in a customer's overall kWh charge and are not broken out separately or shown as independent line items. DEP's new billing system, Customer Connect, which again is planned to be implemented in November 2021, will be, however, able to display the storm recovery charge as a separate line item.
- 7. To reprogram and manipulate CIM to allow for the display of the storm recovery charge on each DEP customer bill as an independent, line item charge for the months prior to implementation of Customer Connect is not feasible or cost-effective. Such an endeavor would be expensive, resource intensive and require design, development, implementation and testing of material CIM program changes, all within a less than six-month

¹ Direct Testimony of Shana W. Angers, at 6, Docket Nos. E-2, Sub 1243 and E-2, Sub 1262 (Oct. 26, 2020).

² Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Joint Petition for Financing Orders, at 24, Docket Nos. E-2, Sub 1243 and E-2, Sub 1262 (Oct. 26, 2020).

timeframe. Moreover, the speed and complexity of such changes would introduce risk of error and failure, as well as the possibility that such implementation would jeopardize other initiatives currently stressing the limits on the CIM legacy billing system, including COVID-19 related billing activities, as well as other rate and regulatory changes required by the North Carolina Utilities Commission.

- 8. Therefore, to comply with the statutory billing requirements of N.C. Gen. Stat. \$ 62-172(d) utilizing CIM from July to October, my team and I have created a temporary billing solution that is equivalent to the requirement of a separate line item charge and otherwise meets the billing requirements of the statute.
- 9. DEP will provide customers with a bill insert for the months of July, August, September, and October (based on the planned implementation of the Customer Connect billing system in November 2021) that describes the storm recovery charge as a separate charge from the customer's overall, main bill. The bill insert will also explain that the "storm recovery charges [were] approved in a financing order issued to [DEP]" and, if applicable, "a statement to the effect that the assignee is the owner of the rights to storm recovery charges and that the public utility or other entity, if applicable, is acting as a collection agent or servicer for the assignee."
- 10. In addition, the bill insert, as well as the Company's website, will include a bill message that directs customers to a simple website calculator that allows customers to calculate their storm recovery charges, or, alternatively, contact DEP via telephone for questions regarding storm recovery charges.
- 11. Last, DEP will provide general notice to customers regarding the storm recovery charge on the Company's website.

12. Based on my experience as Director, Southeast Pricing and Regulatory Solutions at Duke Energy Corporation, it is my opinion that this temporary and alternative billing procedure created by myself and my team will sufficiently address customer questions regarding storm securitization charges. Moreover, once Customer Connect is implemented, DEP customers will begin to receive a single, detailed bill with an individual line item storm recovery charge.

[FURTHER AFFIANT SAYETH NOT]

This the 25^{11} of January, 2021.

BY: Jonathan Byrd

STATE OF NORTH CAROLINA

Lincoln COUNTY

I certify that Jonathan Byrd personally appeared before me this day, acknowledging to me that she signed the forgoing document.

Witness my hand and notarial seal on this the 25 day of January, 2021.

(Place Notary Stamp Here)

Sheila Lernoine
Notary Public
Lincoln County
North Carolina
My Commission Expires 7/21/2024

Sheila Lemoine
Print Name
Sheila Lemoine
Notary Public

My Commission Expires: July 21, 2024

G.S. § 10B-41 NOTARIAL CERTIFICATE FOR ACKNOWLEDGMENT

Lincoln County, North Carolina

I certify that the following person(s) personally appeared before me this day, each acknowledging to me that he or she signed the foregoing document: <u>Jonathan Byrd</u>

Date: January 25, 2021

Official Signature of Notary

Sheila Lemoine, Notary Public

My commission expires: July 21, 2024

My Commission Expires 7/21/2024

I signed this notarial certificate on <u>January 25, 2021</u> according to the emergency video notarization requirements contained in G.S. 10B-25.

Notary Public location during video notarization: Lincoln County

Stated physical location of principal during video notarization: Union County

This certificate is attached to an Affidavit signed by <u>Jonathan Byrd</u> on <u>January 25, 2021</u> and includes <u>6 pages</u> inclusive of this certificate.

Byrd Attachment 1: Proposed DEP Storm Recovery Charge Bill Insert

Effective with rates implemented for service rendered on and after June 1, 2021, a Storm Recovery Charge (SRC) will be included in the per kwh billing amount for all customers. The charge is authorized by N.C. Gen. Stat. § 62-172 and is associated with the recovery of storm securitization costs following approval by the North Carolina Utilities Commission (Commission). This charge is for the purpose of recovering the costs of major storm repairs to DEP's system, and will be adjusted at least semi-annually to ensure timely payment of principal, interest and financing costs of storm recovery bonds from the effective date of the SRC, until the storm recovery bonds have been paid in full or legally discharged and the financing costs have been fully recovered. As approved by the Commission, a Special Purpose Entity (SPE) has been created and is the owner of all rights to the Storm Recovery Charge.

MONTHLY RATE

Effective for service rendered on and after _____, the incremental rate for the appropriate class, including revenue-related taxes and regulatory fees, are as follows:

Rate Class	Applicable Schedules	Billing Rate (¢/kWh)
Residential	RES, R-TOUD & R-TOU	0.281
Small General Service	SGS, SGS-TOUE, SGS TOU-CLR, TSF & TSS	0.302
Medium General Service	MGS, SGS-TOU, SI, CH-TOUE, GS-TES, APH-TES, CSG, CSE	0.047
Large General Service	LGS, LGS-TOU, LGS-RTP	0.016
Lighting	ALS, SLS, SLR & SFLS	0.042

For assistance in calculating your specific storm charges or for further information on the storm securitization costs and recovery charge, visit www.duke-energy.com/zzzzz or call (888)xxx-xxxx.

Customers who need additional time to pay any outstanding balance can choose from several payment arrangement options. Financial ...

ILLUSTRATIVE EXAMPLE





Billing & Payment

MENU ~

Make a Payment

Choose from a variety of payment methods designed to make paying your bill simple, secure and convenient.



Need Help Paying Your Bill? >

If you need assistance, or know

someone who does, Duke Energy has programs to help.

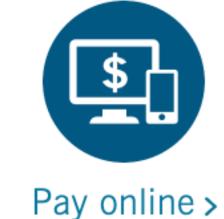
VIEW ALL PROGRAMS



Pay in person >

Make a payment in person at one of our preferred locations.

FIND LOCATION



Sign up for Paperless Billing to use

your checking or savings account to make a one-time payment, or set up automatic monthly payments. Learn More

PAY NOW



Pay with automatic draft > Make an automatic payment by

drafting funds from your bank account.

ENROLL NOW



card, debit card or eCheck > Make a one-time, same-day payment

using Speedpay. This is a third-party vendor. Learn More

PAY NOW



Pay by phone >

Make a one-time, same-day payment using Speedpay. Learn More Call 800.777.9898



Pay using our app > View and pay your bill from

anywhere, anytime. Also see your billing history and personalized offers.

DOWNLOAD NOW



Pay by mail

Mail a check or money order to: Duke Energy P.O. Box 70516 Charlotte, NC 28272-0516

Billing Options

COMPARE PAYMENT METHODS

You've got options. Choose from a variety of billing and payment choices designed to make paying your bill simple, secure and convenient.



Use Duke Energy's free Paperless

Paperless Billing >

Billing & Online Payment service to receive, view and pay your bill online. You can make an immediate payment or sign up for Auto Pay to have your bill automatically paid each month.



If you have a smart meter, you can

choose the date your bill is due.



Make managing your budget easier

with predictable monthly payments.



Prepaid Advantage >

Prepay for your power in smaller amounts when and how you choose.

Billing Resources It's important to us that your bill is clear and makes sense to you. Here are

some resources to help you understand and manage your bill.



New Bill > We've improved your energy bill to

make it easier to understand with

visual highlights and usage history data.



The simplified, easy-to-read sections of our new bill help you find - and

understand - important account

information quickly.



Get notifications by text or email when your payment has been applied

to your account.



View an interactive sample bill to help

you better understand your energy

usage.



our customers through monthly bill

inserts. View those inserts here whenever you wish.



determining the price you pay for energy. Learn more about how your

rate is calculated.



household routine.



Get notifications about your energy use to help stay on budget and in

control.





What to Do if Your Power Has Been

Find out what steps to take to get your service restored.

LEARN MORE

BUILDING A SMARTER ENERGY FUTURE®

Disconnected



PARTNER WITH US

Trade Allies

Asset Recovery

Property Managers

Economic Development

Real Estate Properties

Suppliers







Download on the App Store

Storm Safety Natural Gas Safety Builders Developers and Contractors

SAFETY AND PREPAREDNESS

High Water and Dam Safety Overhead Power Lines

Electric Safety Nuclear Safety Identifying Our Employees Kids Safety Workers and First Responders

Report Environmental Concern

Call Before You Dig

Google Play

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COMMUNITY Duke Energy Foundation

Employee Engagement

@ Sign up for Email

Energy Assistance Programs Lakes Vegetation Management Alumni Network

ENERGY EDUCATION

Privacy Terms of Use Accessibility

DUKE ENERGY RENEWABLES

BUSINESS ENERGY SERVICES

CUSTOMER SERVICE

HOME SERVICES

© Duke Energy Corporation. All Rights Reserved.

OUR COMPANY

About Us

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Careers

News Center

Social Media

Environment

Sustainability

ESG

Duke Energy Progress, LLC Docket Nos. E-7, Sub 1243 and E-2, Sub 1262



Billing & Paymentstrative example



Storm Cost Recovery

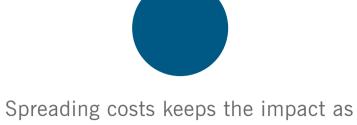
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It saves Duke Energy customers millions of dollars.

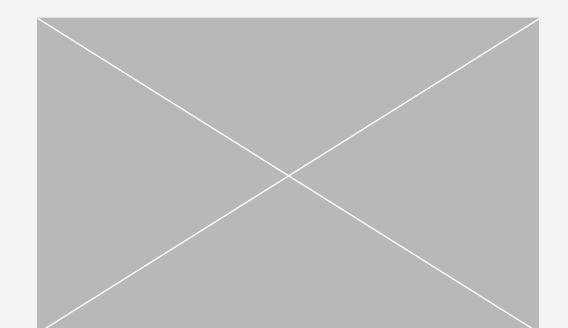


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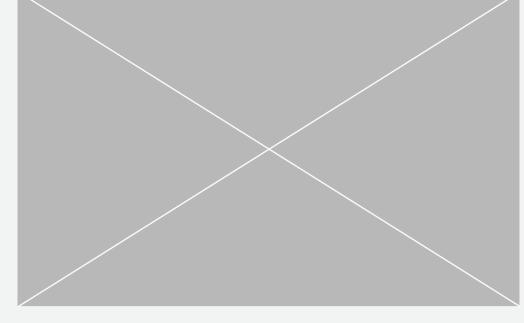
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How it affects your bill



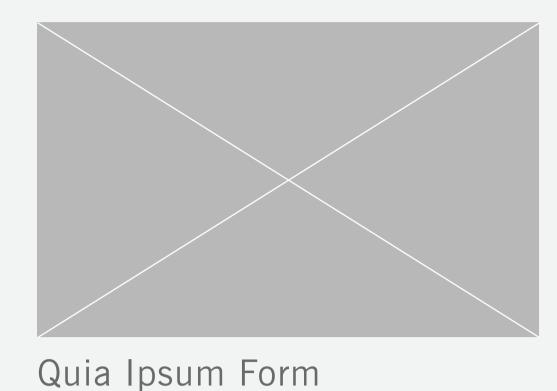
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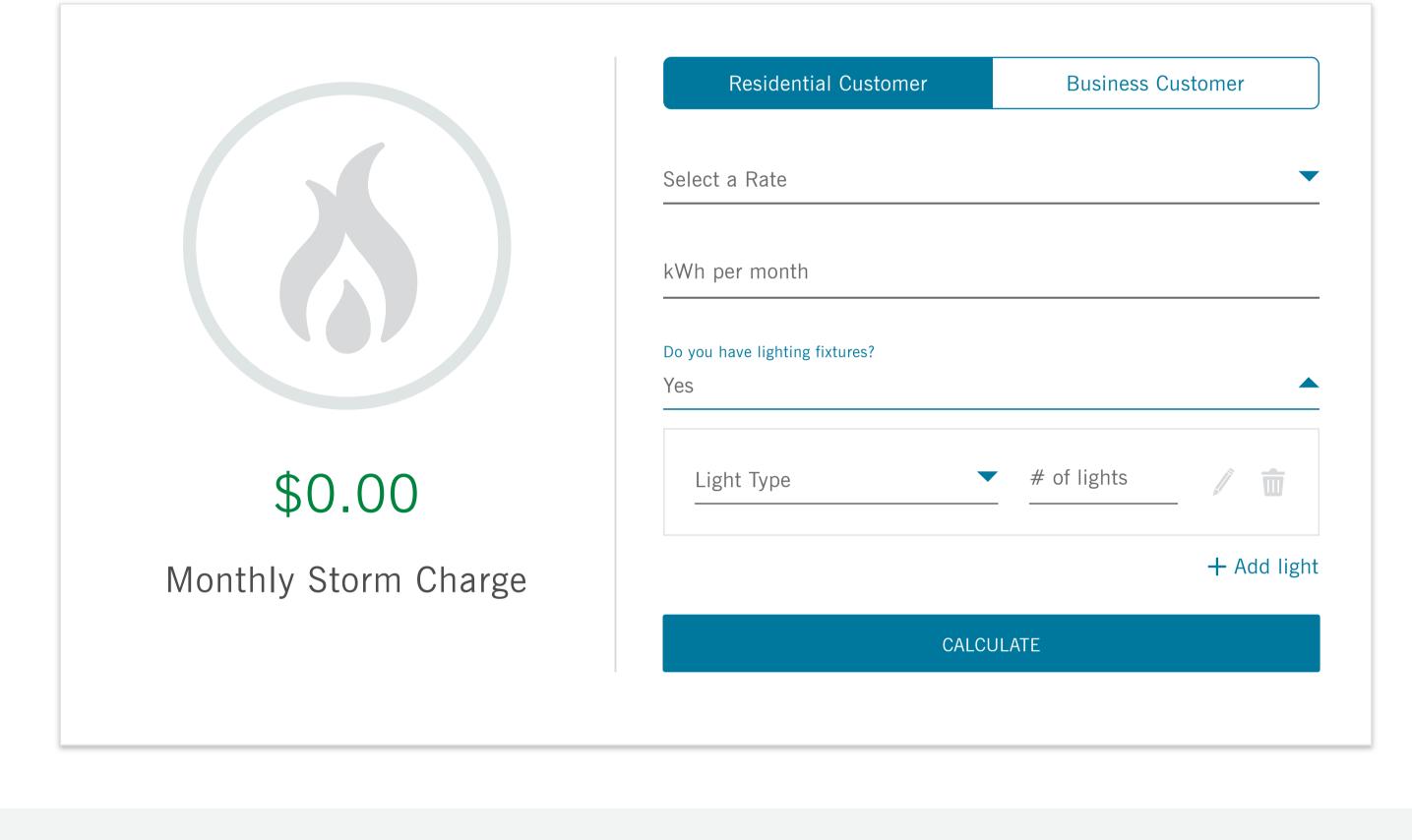
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Frequently Asked Questions

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This is a frequently asked question?

BUILDING A **SMARTER** ENERGY FUTURE®



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Customer Support Business Billing & Payments

Start or Stop Service

Customer Support

Billing & Payments

Start or Stop Services

Home

Asset Recovery

Builders, Developers & Contractors **Property Managers Economic Development**

Real Estate Properties

Electric Safety Natural Gas Safety

Google Play

@ Sign up for email

Nuclear Safety Storm Safety Community **Duke Energy Foundation**

Trees and Rights of Way

Spanish

Lakes

Privacy

Energy Education Duke Energy Renewables

Business Energy Services

Outages

Home Service

Duke Energy Progress, LLC Docket Nos. E-7, Sub 1243 and E-2, Sub 1202

Accessibility

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Report Environmental Concern

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Trade Allies Suppliers

in

Download on the App Store

Billing summary

Previous amount due

Payment received

Renewable Energy Rider

Storm Recovery Charge 749 kWh @ .000565

Basic Facilities Charge

Energy Charge

Taxes

duke-energy.com 800.777.9898

\$ 95.90

- 95.90

\$14.00

66.96

0.83

0.42

5.73

\$87.94

Your Energy Bill

Byrd Attachment 3 Page 1 of 3

page 1 of 3

Service address John Q. Sample 2517 Example Rd Shelby, NC 28152

Bill date Sep 16, 2020 For service Aug 14 - Sep 15 32 days

Account number 9100 0000 1111

(\$)

Thank you for your payment.

Your current rate is Residential Service Electric (RE).

For a complete listing of all North Carolina residential rates and riders, visit duke-energy.com/home/billing/rates.

Your usage snapshot

Total amount due Oct 12



Mail your payment at least 7 days before the due date or pay instantly at duke-energy.com/billing. Late payments are subject to a 1% late charge.

Amount due

\$ 87.94 by Oct 12 After Oct 12, the amount due will increase to \$88.82.

Add here, to help others with a contribution to Share the Warmth

Amount enclosed

Duke Energy Payment Processing P.O. Box 70516 Charlotte NC 28272-0516

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Please return this portion with your payment. Thank you business. 210000064789

Account number

9100 0000 1111



Duke Energy Retun Mail PO Box 1090 Charlotte NC 28201-1090

12-Month usage based on most recent history

000549 0000024295

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John Q. Sample 2517 Example Rd Shelby, NC 28152

page 2 of 3

We're here for you

Report an emergency

Electric Outage

duke-energy.com/outages 800.769.3766

Convenient ways to pay your bill

Online

Automatically from your bank account

Speedpay

By mail payable to Duke Energy

In person

duke-energy.com/billing duke-energy.com/draft duke-energy.com/pay-now 800.777.9898

P.O. Box 70516 Charlotte, NC 28272 duke-energy.com/location

Help managing your account (not applicable for all customers)

Register for free paperless billing

Home **Business** duke-energy.com/paperless duke-energy.com/manage-hom duke-energy.com/manage-bus

General questions or concerns

Online

Call (Monday - Friday, 7 a.m. to 7 p.m.) 800.777.9898 For hearing impaired TDD/TTY

duke-energy.com 888.762.2724 or 7

Check utility rates

Check rates and charges

orgy.con. ates

Correspond with Duke Energy (not for pay

P.O. Box 70516 Charlotte, NC 28201

Important to know

Your next meter reading: Oct 14

Please be sure we can safely access your meter. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

Your electric service may be disconnected if your payment is past due

If payment for your electric service is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay your past-due balance in full, plus a recon ction fe, before your service will be reconne ed the reconnection fee is \$29.03. A security posit my also be required.

Vectric service does not depend on payment for on r pror' cts or services

ment for non-regulated products or services you have (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

When you pay by check

We may process the payment as a regular check or convert it into a one-time electronic check payment.

Late Payment Charges

A late payment charge of 1% will be added for any past due utility balance not paid by the due date.

Storm Recovery

This is a placeholder for the explanation for the back of the bill.

Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. - 7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.777.9898.

page 3 of 3



Your usage snapshot - continued

Current electric usage for meter number 019980

Actual reading on Sep 15 89595 Previous reading on Aug 14 - 88846

Energy used 749 kWh



A kilowatt-hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.



CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing <u>Notice of Billing Compliance</u>

<u>Procedure</u> as filed in Docket Nos. E-7, Sub 1243 and E-2, Sub 1262, were served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 25th day of January, 2021.

/s/Kristin M. Athens

Kristin M. Athens McGuireWoods LLP 501 Fayetteville Street, Suite 500 PO Box 27507 (27611) Raleigh, North Carolina 27601 Telephone: (919) 835-5909 kathens@mcguirewoods.com

Attorney for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC