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Apr 13 2021

Andrea R. Kells Direct: 919.755.6614

April 13, 2021

VIA Electronic Filing

Ms. Kimberly A. Campbell, Chief Clerk North Carolina Utilities Commission Dobbs Building 430 North Salisbury Street Raleigh, North Carolina 27603

> *Re:* In the Matter of Petition for Approval of Revisions to Generator Interconnection Standards Docket No. E-100, Sub 101

In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities – 2018 Docket No. E-100, Sub 158

Letter in Lieu of Initial Response

Dear Ms. Campbell,

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC" or the "Company") respectfully submits this letter in lieu of an initial response pursuant to the Order Requiring Additional Information ("Order") issued by the North Carolina Utilities Commission ("Commission") on March 29, 2021, in the above captioned dockets. In the Order, the Commission summarized previous orders and pleadings issued and filed in these dockets relating to the Solar Integration Services Charge ("SISC") developed by Duke Energy Progress, LLC and Duke Energy Carolinas, LLC ("Duke") in Docket No. E-100, Sub 158, Duke's proposed SISC avoidance requirements, and the stakeholder process addressing the addition of energy storage at existing QFs that was held during 2020.

The Commission directed Duke to respond by April 13, 2021, to questions regarding how it derived the volatility thresholds for SISC reduction, and Duke's proposal to install a second meter as needed at no expense to QFs and to study the meter and report the study results to the Commission. The Commission also allowed other parties to respond to these questions on or before April 13, 2021, and allowed all parties to reply by April 27, 2021.

Atlanta | Austin | Baltimore | Charlotte | Charlottesville | Chicago | Dallas | Houston | Jacksonville | London | Los Angeles - Century City Los Angeles - Downtown | New York | Norfolk | Pittsburgh | Raleigh | Richmond | San Francisco | Tysons | Washington, D.C. Ms. Kimberley A. Campbell, Chief Clerk April 13, 2021 Page 2

The Company has carefully reviewed the pleadings and orders discussed in the Order; however, as the questions presented in the Order are focused on the Duke SISC, DENC does not have responses to the Commission's questions to provide at this time. The Company may, upon review of Duke's and other parties' responses, file a reply as allowed by the Commission by April 27, 2021.

Please do not hesitate to contact me if you have any questions. Thank you for your assistance in this matter.

Very truly yours,

/s/Andrea R. Kells

ARK:kjg

Apr 13 2021

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Letter in Lieu of Initial Response filed

in Docket Nos. E-100, Sub 101 and E-100, Sub 158 were served electronically or via

U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 13th day of April, 2021.

/s/Andrea R. Kells

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Attorney for Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina