

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Duke Energy Carolinas, LLC,)
Duke Energy Progress, LLC, and) Docket No. ER21-1579-000
Duke Energy Florida, LLC)

**MOTION TO INTERVENE AND COMMENTS IN SUPPORT
OF THE AMERICAN COUNCIL ON RENEWABLE ENERGY**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure¹ of the Federal Energy Regulatory Commission (“Commission”), the American Council on Renewable Energy hereby moves to intervene and file comments in the above-captioned proceeding.

I. BACKGROUND

On April 1, 2021, Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP”) and Duke Energy Florida, LLC (“DEF”) (collectively, the “Duke Southeast Utilities”) submitted a filing with the Commission in the above-captioned proceeding which contains modifications to their *pro forma* Large Generator Interconnection Procedures and Large Generator Interconnection Agreement attached as Attachment J to their Joint Open Access Transmission Tariff (“Queue Reform Filing”).²

In the Queue Reform Filing, the Duke Southeast Utilities propose the ability to elect, on an individual transmission provider basis, whether to move from a first-come, first-served serial generator interconnection process to a first-ready, first-served clustered interconnection process. The Commission issued a Notice of Filing in this proceeding setting a deadline of April 22, 2021 for public comments in this docket.

¹ 18 C.F.R. §§ 385.212 and 385.214 (2020).

² Revisions to Attachment J (Large Generator Interconnection Procedures) to Joint OATT of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Duke Energy Florida, LLC, Docket No. ER21-1579-000 (Apr. 12, 2021).

II. MOTION TO INTERVENE

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Commission, the American Council on Renewable Energy (“ACORE”) hereby moves to intervene in this matter. ACORE is a national nonprofit organization dedicated to advancing the renewable energy sector through market development, policy changes and financial innovation.

Many companies that invest in and develop renewable energy generation projects have financed and constructed renewable generating assets in reliance on Duke Southeast Utilities’ Large Generator Interconnection Procedures and Large Generator Interconnection Agreement. As such, the renewable energy sector will be directly affected by, and has a significant interest in, the outcome of this proceeding. Accordingly, ACORE respectfully requests that it be granted intervention in this proceeding, with full rights attendant to party status.

III. COMMENTS

Across the nation, current interconnection processes are excessively costly, slow and unpredictable. At the end of 2019, 734 gigawatts of proposed generation — 90 percent of which are new wind, solar, and storage projects — were waiting in interconnection queues nationwide.³ Excessive interconnection queues increase electricity costs by delaying the construction of new energy projects, which are often cheaper than existing electricity production, and delay or prevent states from achieving their public policy decarbonization goals.

The Duke Southeast Utilities’ Queue Reform Filing will help begin to address the backlog of generators awaiting interconnection reform in their region, which has mirrored the trend of national queue growth in recent years. The clustered interconnection process, when

³ Americans for a Clean Energy Grid. “Disconnected: The Need for a New Generator Interconnection Policy.” January 2021. Accessed April 19, 2021 from <https://cleanenergygrid.org/wp-content/uploads/2021/01/Disconnected-The-Need-for-a-New-Generator-Interconnection-Policy-1.14.21.pdf>.

elected, can help increase the efficiency and transparency of movement through the interconnection queue as ready projects are prioritized for joint review.

ACORE recognizes that the Commission is currently considering broader changes to transmission planning and interconnection processes writ large. Approving the Duke Southeast Utilities' Queue Reform Filing does not fulfill this larger need, but it is a step forward in the spirit of this process. We encourage the Commission to approve this filing in a timely manner.

IV. COMMUNICATIONS

All communications related to this proceeding should be addressed to:

Tyler Stoff
Director of Regulatory Affairs
stoff@acore.org

American Council on Renewable Energy
1150 Connecticut Ave N.W., Suite 401
Washington, D.C. 20036

V. SERVICE OF FILING

This filing will be served electronically on the official service list in this proceeding.

VI. CONCLUSION

For the reasons set forth above, ACORE hereby respectfully moves to intervene in the above-captioned proceeding and requests that the Commission consider its comments in such proceeding.

Respectfully submitted,

/s/ Tyler Stoff

Tyler Stoff
Director of Regulatory Affairs
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American Council on Renewable Energy
1150 Connecticut Ave N.W., Suite 401

Washington, D.C. 20036

Dated: April 21, 2021

CERTIFICATE OF SERVICE

In accordance with 18 C.F.R. § 385.2010(f)(2), I hereby certify that the foregoing document was served electronically today upon each person designated on the official service lists compiled by the Secretary in these proceedings.

Dated: April 21, 2021

/s/ Tyler Stoff

Tyler Stoff

Director of Regulatory Affairs

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