

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-349-E**

In the Matter of:	)	
	)	DUKE ENERGY CAROLINAS, LLC AND
Joint Petition of Duke Energy Carolinas, LLC	)	DUKE ENERGY PROGRESS, LLC'S
and Duke Energy Progress, LLC to Request	)	NOTICE OF WITHDRAWAL OF THE
the Commission to Hold a Joint Hearing with	)	JOINT PETITION PURSUANT TO S.C.
the North Carolina Utilities Commission to	)	CODE ANN. § 58-3-225(E)
Develop Carbon Plan	)	
	)	

---

Pursuant to S.C. Code Ann. § 58-3-225(E), Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, “Duke Energy” or the “Companies”), by and through the undersigned counsel, submit to the Public Service Commission of South Carolina (the “Commission”) this Notice of Withdrawal of their Joint Petition filed on November 9, 2021.

After reflecting on certain stakeholders’ objections to the requested joint proceeding between this Commission and the North Carolina Utilities Commission (“NCUC”) pursuant to S.C. Code Ann. § 58-27-170, the Companies do not want their request to distract from the goal of encouraging coordination between South Carolina and North Carolina on planning the energy transition to meet the needs of its customers in both states.

Duke Energy has operated a dual-state system across South Carolina and North Carolina for over a century, and this model is the most optimal and efficient way to provide reliable, efficient, and increasingly clean energy to its customers at affordable rates. Without the scope and scale of the dual-system, it is highly likely the Companies would have never built projects of the magnitude of the Robinson nuclear facility, or the three-unit nuclear site in Oconee County, or the pumped storage hydro facility at Bad Creek. These projects have been major drivers of economic

development in South Carolina and provided a significant tax base and employment to thousands over the years.

The goal of the Companies in seeking a joint proceeding, as allowed under South Carolina law, was to provide a formal forum in which all stakeholders would have a seat at the table to discuss resource planning issues of critical importance to the future of both states. For decades, the Commission and the NCUC have overseen Duke Energy's dual-state planned and operated utility systems. The benefits of this dual planning and multi-state operation speak for themselves: reliable and safe electric service; rates below national averages; and, a relatively low carbon intensity fleet—including nation-leading amounts of nuclear and solar generation located in South Carolina and North Carolina. Together, these features constitute a strong foundation upon which to continue providing increasingly clean energy to customers in South Carolina and to attract new customers with clean energy goals, thereby maintaining the state's competitive advantage in economic development.

Viewed from this historic lens, although the requested joint proceeding was a unique and novel procedural path, the intended outcome—continuing to work together to deliver the benefits of dual-state planning to the Companies' customers in South Carolina and North Carolina—is not new at all, but is instead a continuation of the dual-system planning and operation that has benefitted customers in the Carolinas for generations. If the benefits of dual-state planning and operation are to be maintained, then coordination between the states is essential in planning for future resources on a least cost basis.

However, because the procedural complexities presented by the potential joint proceeding have, in some cases, prevented stakeholders from focusing on the important resource planning issues that the Companies sought to address through the joint proceeding, it has become apparent

to the Companies that the potential benefits of the joint proceeding are unlikely to be realized. Accordingly, although the Companies intend to eventually file the Carolinas Carbon Plan in South Carolina to ensure transparency in this process, the Companies hereby give notice that they withdraw the Joint Petition, as a matter of right, without prejudice. *See* S.C. Code Ann. § 58-3-225(E). Due to the unique, foundational nature of the Carolinas Carbon Plan, the Companies continue to encourage stakeholders in South Carolina to seek to participate in the proceedings in North Carolina as the Carolinas Carbon Plan is being developed and evaluated. The Companies also intend to continue to engage South Carolina stakeholders on the Carolinas Carbon Plan to ensure views from South Carolina are considered in this important matter.

Dated this 24th day of January, 2022.

Respectfully submitted,

/s/Frank R. Ellerbe, III

Frank R. Ellerbe, III

Vordman Carlisle Traywick, III

ROBINSON GRAY STEPP & LAFFITTE, LLC

1310 Gadsden Street

Columbia, South Carolina 29201

(803) 929-1400

fellerbe@robinsongray.com

ltraywick@robinsongray.com

Camal O. Robinson

Deputy General Counsel

Duke Energy Corporation

40 W. Broad Street, Suite 690

Greenville, South Carolina 29601

(864) 238-4385

Camal.Robinson@duke-energy.com

*Attorneys for Duke Energy Carolinas, LLC and  
Duke Energy Progress, LLC*