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July 24, 2025

VIA ELECTRONIC FILING

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

**RE: Duke Energy Carolinas, LLC's Notification to the North Carolina Utilities Commission of Preliminary Plans to Construct an 850 MW Natural Gas-Fueled Simple Cycle Combustion Turbine Electric Generating Facility in Rowan County, North Carolina
Docket No. E-7, Sub 1330**

Dear Ms. Dunston:

Enclosed for filing with the North Carolina Utilities Commission ("Commission") in the above-referenced proceeding is Duke Energy Carolinas, LLC's ("DEC" or the "Company") Preliminary Plans to Construct an Electric Generating Facility in Rowan County, North Carolina ("Preliminary Plans"). The Company is filing the Preliminary Plans pursuant to Commission Rule R8-61(a), in advance of filing an application for a certificate of public convenience and necessity ("CPCN") to construct two approximately 425 megawatt ("MW") advanced-class simple-cycle gas combustion turbines for the generation of electricity (the "Proposed Facility") at the site of its existing Buck Combined Cycle Station ("Buck") in Rowan County, North Carolina.

The Need for the Proposed Facility is Supported by the 2023-2024 CPIRP

DEC's and Duke Energy Progress, LLC's (together with DEC, the "Companies") 2023-2024 Carbon Plan and Integrated Resource Plan ("CPIRP" or the "Plan"), as filed with the Commission in Docket No. E-100, Sub 190, identified a planning need for a total of five combustion turbines ("CT"), including the Proposed Facility's two CTs, to achieve commercial operation by 2031. The CPIRP identified the Proposed Facility as needed by 2030.¹ On July 22, 2024, in Docket No. E-100, Sub 190, the Companies filed an Amended

¹ The timing of this Preliminary Plans filing will enable the Company to file a CPCN Application for the Proposed Facility in Q4 2025, which is consistent with the Companies' 2023 CPIRP Execution Plan as set forth in the Commission's 2023 CPIRP Order. *See Order Accepting Stipulation, Granting Partial Waiver of Commission Rule R8-60A(d)(4), and Providing Further Direction for Future Planning* at 91, Docket No. E-100, Sub 190 (Nov. 1, 2024) ("CPIRP Order").

Agreement and Stipulation of Settlement between the Companies, the Public Staff – North Carolina Utilities Commission, Walmart, Inc., and the Carolinas Clean Energy Business Association (“CPIRP Stipulation”) in which the Stipulating Parties agreed that the Commission should select 900 MW of new CT capacity incremental to the CT capacity approved in the Commission’s December 30, 2022 *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning* issued in Docket No. E-100, Sub 179.²

On November 1, 2024, the Commission issued the CPIRP Order, in which the Commission directed the Companies to proceed with planning for the new incremental natural gas resources recommended for selection in the CPIRP Stipulation, including CTs 3&4 to achieve commercial operation by 2030.³ The Commission determined that new natural gas fueled generation will “enable coal retirements, assist in meeting load growth, facilitate the integration of renewable energy, and contribute to resource adequacy on Duke’s system”⁴ and recognized that these flexible CT generating facilities are necessary “to ensure that system operators have the tools they need to manage system dynamics, ensure reliable operation, and protect the integrity of the bulk power system and Eastern Interconnection as dynamics in North Carolina change.”⁵ Based on the substantial evidence in the record of that proceeding, the Commission concluded that the proposed CTs are “needed and consistent with the requirements of the Carbon Plan Statute, including the requirement to maintain or improve upon the adequacy and reliability of the existing grid.”⁶ The Proposed Facility will provide the incremental CT capacity identified as needed and selected by the Commission in the CPIRP Order.⁷

The Company will provide additional information on the need for the Proposed Facility and how its construction is required by the public convenience and necessity in the forthcoming CPCN Application.

The Proposed Facility Has Numerous Favorable Siting Attributes

The Buck site is reasonable and provides significant advantages from a siting perspective, leveraging existing natural gas transmission infrastructure, water supply, and Company-owned land. The Proposed Facility will provide incremental peaking generation to serve DEC’s customers growing energy needs, and the Company is not planning to

² On December 2, 2024, the Commission issued an Order authorizing DEC to construct CTs 1&2 at the Marshall Energy Complex, consistent with the CT resources identified in the initial 2022 Carbon Plan Order. See *Order Granting Certificate of Public Convenience and Necessity*, Docket No. E-7, Sub 1297 (Dec. 2, 2024).

³ CPIRP Order at 117.

⁴ CPIRP Order at 116.

⁵ CPIRP Order at 115.

⁶ *Id.*

⁷ The Public Service Commission of South Carolina also reviewed the Companies’ 2023 Carolinas Resource Plan and determined that the Companies’ modeling and IRP need for new gas generation is reasonable and that the specific actions set forth in the Companies’ Near-Term Action Plan for executing on new gas generation are in the public interest of South Carolina and are reasonable steps for the Companies to take between now and the Companies’ next Comprehensive IRP in South Carolina. Order Approving 2023 Integrated Resource Plan, Order No. 2024-767, at 176-177, 207, PSCSC Docket Nos. 2023-8-E & 2023-10-E (Nov. 25, 2024).

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contemporaneously retire any existing generating facilities to interconnect and operate the Proposed Facility. The Company has submitted the Proposed Facility for study in the 2024 Definitive Interconnection System Impact cluster study (“DISIS”) process. Recent reports from that process support the construction schedule and suggest that only limited network upgrades will be necessary to safely and reliably interconnect the Proposed Facility – providing further support for the Company’s site selection analysis. The Company will provide additional information on the interconnection-related costs and system impacts in the forthcoming CPCN Application.

Notice of Preliminary Plans Provided to Department of Environmental Quality

Consistent with Rule R8-61, DEC is providing these Preliminary Plans to the North Carolina Department of Environmental Quality (as the successor to the North Carolina Department of the Environment and Natural Resources).

The Company will submit the requisite filing fee required pursuant to N.C.G.S. § 62-300(a)(5) when it files the CPCN application.

Please feel free to contact me should you have any questions. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason A. Higginbotham", with a long horizontal flourish extending to the right.

Jason A. Higginbotham

Enclosure

cc: Christopher J. Ayers, Executive Director, Public Staff
Lucy Edmondson, Chief Counsel, Public Staff
Nadia Luhr, Manager – Electric Section, Legal Division, Public Staff

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JUL 24 2025