



Mr. David Meyer
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Submitted electronically via email to: Congestionstudy.comments@hq.doe.gov

Re: Department of Energy – Draft National Electric Transmission Congestion Study, 79 Fed. Reg. 49076 (Aug. 19, 2014)

Dear Mr. Meyer:

Duke Energy Corporation (“Duke Energy”) respectfully submits these comments in response to the above-referenced Department of Energy (“DOE”) Draft National Electric Transmission Congestion Study dated August 2014 (“Congestion Study”) which focuses on indications of transmission constraints and congestion within the nation’s footprint. Duke Energy generally supports the comments to the DOE Congestion Study submitted by the Edison Electric Institute (“EEI”) and appreciates the opportunity to provide comments to certain findings in the DOE Congestion Study and suggested corrections to information specific to Duke Energy that was contained in such study.

I. COMMENTS TO CERTAIN FINDINGS AND INFORMATION SPECIFIC TO DUKE ENERGY IN THE DOE CONGESTION STUDY

Duke Energy offers the following comments to certain findings in the DOE Congestion Study and suggested revisions to information specific to Duke Energy contained in the DOE Congestion Study. Duke Energy requests that DOE consider these comments and incorporate these suggested revisions into the final version of the study.

- In the first full paragraph on page 76, the reference to the Collaborative report should be as follows:

- “The Collaborative has updated ~~finalized~~ its fifth report...” and the dollar amount should be changed to \$309 million.
- Footnote 164 should include a revised second link as follows:
 - http://www.nctpc.net/nctpc/document/REF/2012-09-06/2011_Collaborative_Transmission_Plan_Update_090512.pdf.
- The second full paragraph on page 76 should include the names of all utilities participating in the SIRPP, and should therefore read:
 - “The SIRPP sponsor group includes the Southern Company, Duke Energy Carolinas, South Carolina Electric & Gas, the Entergy Companies, ~~and~~ the Tennessee Valley Authority, Dalton Utilities, Georgia Transmission Corporation, LG&E/KU, Municipal Electric Authority of Georgia, PowerSouth, Progress Energy Carolinas, Santee Cooper, and South Mississippi Electric Power Association. This group has conducted regionalized...”
- In footnote 166, the South Mississippi Electric Power Association should be removed and Duke Energy Carolinas, LLC and Duke Energy Progress, Inc. should be added.
- In the final paragraph on page 77 continuing onto page 78, the coal plant retirement information should be updated to read the following:
 - “These include retirements of older, smaller coal plants such as the H.F. Lee (in NC) in September 2012, the W.H. Weatherspoon (in NC) plants in October 2011, the final two Cape Fear Plant (NC) 175 units, Robinson (SC)¹⁷⁶ in October 2012; and the L.V. Sutton (NC) plant in November 2013; totaling 1,600 MW...”
- The first full paragraph on page 78 should include the following revisions:
 - “Duke Energy is also investing in several new gas-fired plants in North Carolina - at the Dan River Steam Station site and Buck Steam Station, Duke Energy retired three old coal units at Dan River in 2012...”
 - After the closing parenthesis, please place a period and start a new sentence “A second 620 MW gas-fired plant was completed at Buck Station in November 2011 after which Duke retired the site’s four existing coal-fired units.”
- In the second full paragraph on page 82, a new sentence should be added at the end of the paragraph (immediately after footnote 200) to read as follows:
 - “On February 5, 2013, Duke Energy announced its decision to retire the Crystal River Nuclear Plant.²⁰¹ This reduces the FRCC nuclear capacity in the FRCC region by approximately 860 MWs.”

- New footnote 201 should read as follows: ²⁰¹ Duke Energy Florida's retirement of the Crystal River Nuclear Plant, <http://www.duke-energy.com/power-plants/nuclear/crystal-river.asp>.

II. CONCLUSION

Duke Energy appreciates the opportunity to provide these comments in response to the DOE Congestion Study. If you have any questions or need additional information, please contact Bill Greene, Director of FERC Policy (513-287-2312, bill.greene@duke-energy.com), Nina McLaurin, FERC Policy Development Director (919-546-7927, nina.mclaurin@duke-energy.com), or Ann Warren, Associate General Counsel (704-382-2108, ann.warren@duke-energy.com).

Respectfully submitted,

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