

**JOHN D. RUNKLE**  
ATTORNEY AT LAW  
2121 DAMASCUS CHURCH ROAD  
CHAPEL HILL, N.C. 27516

919-942-0600  
jrunkle@pricecreek.com

VIA MAIL & EMAIL

July 18, 2012

Kodwo Ghartey-Tagoe  
Vice President – Legal  
Duke Energy  
Mail Code EC03T  
PO Box 1006  
Charlotte, NC 28201

Len C. Anthony  
General Counsel  
Progress Energy  
PEB17A4  
PO Box 1551  
Raleigh, NC 27602

Re: Docket Nos. E-7, Sub 986 and E-2, Sub 998

Gentlemen:

NC WARN is submitting the attached Data Requests to assist in our determination whether to request a reconsideration of the Commission's order in the merger docket. A prompt response would be of assistance.

Sincerely,

*/s/ John D. Runkle*

John D. Runkle  
for NC WARN

cc. Robert Kaylor

DATA REQUEST by NC WARN -- July 18, 2012

To: Duke Energy Carolinas LLC

Re: Docket Nos. E-7, Sub 986 and E-2, Sub 998

Please send the responses to the following data request to:

John D. Runkle  
Attorney at Law  
2121 Damascus Church Rd.  
Chapel Hill, NC 27516  
919-942-0600  
[jrunkle@pricecreek.com](mailto:jrunkle@pricecreek.com)

## DATA REQUESTS

1-1. Please provide:

- a. Copies of all studies conducted by Zapata Engineering on behalf of Duke Energy on the uprates and repairs at the Crystal River Nuclear Power Plant, including but not limited, the contract between Zapata and Duke Energy, the scope of work, preliminary reports, final report, correspondence, memorandum, emails, cover letters and presentation materials.
- b. Copies of all studies conducted by any engineering or consulting firm (other than Zapata Engineering) on behalf of Duke Energy on the uprates and repairs at the Crystal River Nuclear Power Plant including but not limited, the contract between the firm and Duke Energy, the scope of work, preliminary reports, final report, correspondence, memorandum, emails, cover letters and presentation materials.

## NC WARN DATA REQUEST

1-2. Please provide:

- a. Copies of all studies conducted by any engineering or consulting firm on behalf of Duke Energy on the need for investments in the nuclear fleet previously owned by Progress Energy, including but not limited, the contract between the firm and Duke Energy, the scope of work, preliminary reports, final report, correspondence, memorandum, emails, cover letters and presentation materials.
- b. Copies of all studies conducted by employees of Duke Energy on the need for investments in the nuclear fleet previously owned by Progress Energy, including but not limited, the contract between the firm and Duke Energy, the scope of work, preliminary reports, final report, correspondence, memorandum, emails, cover letters and presentation materials.
- c. Copies of all studies conducted by employees of Progress Energy on the need for investments in the nuclear fleet previously owned by Progress Energy, including but not limited, the contract between the firm and Duke Energy, the scope of work, preliminary reports, final report, correspondence, memorandum, emails, cover letters and presentation materials.

1-3. Please provide

- a. Copies of all documents provided to the NC Utilities Commission in response to its requests in NCUC Docket E-7, Sub 1017.