



From: NC Conservation Network et al.
To: NC Utilities Commission
Re: North Carolina Carbon Plan, Docket E-100, Sub 179

Dear Chair Mitchell & Commissioners,

The Carbon Plan offers a historic opportunity to reorient our state's energy system away from fossil fuels and toward a more affordable, distributed, resilient grid that better serves the needs of North Carolinians. We are hopeful that the Carbon Plan process can incorporate input from communities across the state and include all those who seek access to clean energy for their homes, businesses, schools and communities. We write to urge you to ensure that the development of the state's first Carbon Plan is inclusive of the needs of local communities, and stands as a model for future iterations of this long term process.¹

The Carbon Plan should build on the work of the Clean Energy Plan (CEP) stakeholder process, which included regional listening sessions and online and direct input in addition to the facilitated workshops. House Bill 951 mandated the carbon emission reduction targets set by the CEP, but failed to address a key issue raised by CEP stakeholders, 60% of whom agreed that the energy system, as it is now, fails to suitably address equity concerns.² The Commission now has the opportunity, in the design of the Carbon Plan process, to ensure fair treatment and meaningful engagement from those most impacted currently and by the future design of our energy system.

This historic opportunity will happen only if NCUC embarks on an intentional effort to educate the most impacted communities so that they will be able to articulate their concerns about how any proposed plan will affect them and their communities. Communities cannot actively engage if they do not understand the process or the concepts under consideration in the Plan. Educating the public will also guarantee fair treatment and meaningful engagement in this process. Any plan that does not include an education component will fail to meaningfully engage these communities.

1. **The Carbon Plan stakeholder process must be open to the public.** Decisions made about the future of our electric power system will impact all who live and work in North Carolina. To reflect the broad implications of this important and far-reaching policy process, stakeholder convenings must be open and accessible to all interested parties, and must not be conducted through an invite-only process. The Stakeholder meetings should be hybrid-streamed online as well as conducted in person in impacted communities, public health at the time permitting, and public feedback must be addressed by utilities and public staff in required reporting from these meetings.

¹ [NCDEQ Clean Energy Plan Stakeholder Process](#), Oct 2019

² Id. at 22

2. **The stakeholder process and any subsequent public process should be facilitated by a third party.** The utility, which is itself an interested party in the Carbon Plan proceeding, should not be responsible for characterizing the input of all stakeholders. An independent third party, preferably one familiar with the Clean Energy Plan process and North Carolina's work on decarbonization to date, should serve as both the stakeholder meeting facilitator and reporter to the Commission of stakeholder meeting discussions. This will allow for more robust and balanced dialogue, resulting in a more objective recommendation to the Commission.
3. **The stakeholder process should allow for working groups.** While inclusive stakeholder meetings are essential to gathering public input, it may also prove helpful to allow for smaller working groups, meeting outside of the mandated stakeholder meetings, to address potentially contentious technical matters, such as cost assumptions, and report back to the larger stakeholder group.
4. **The Commission must proactively include communities often excluded from commission processes.** In order to reach communities across the state who are not traditionally party to Commission dockets the NCUC should hold public meetings outside of business hours during a public hearing and comment process. The NCUC should proactively solicit the input of the public at large, with particular emphasis on the perspectives of low to moderate income ratepayers and historically disadvantaged communities, especially those impacted by existing and potential fossil fuel infrastructure.

As NCDEQ's Public Participation Plan³ recommends, ensuring representative public engagement requires adequate media and social media publication of events, and translation services for North Carolinians who may lack English proficiency. In addition, engagement will require direct communication "with interested parties, such as community members, local and Tribal governments, community organizations, and non-profit organizations."⁴ Finally, it is essential that the utility or third party facilitators publish public-facing Carbon Plan documents, aimed not only at experts but the general public, with sufficient notice to allow the participation of the public as informed stakeholders, both in the stakeholder process and during any subsequent public process.

We thank you for your attention to this matter and look forward to crafting a plan for a low carbon energy system with you in the coming year.

Sincerely,

Will Scott

North Carolina Conservation Network

David Kelly

Environmental Defense Fund

Greg Andeck

Audubon North Carolina

Carrie Clark

NC League of Conservation Voters

Susannah Tuttle

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3 [NCDEQ Public Participation and Limited English Proficiency Plan](#), Feb/Dec 2020, see in particular p.5 "Enhanced Engagement Methods to Reach Underserved Communities"

4 Id. at 6