

Grant, Lakisha

From: Ruth Hubbard Lovinsohn
Sent: Thursday, May 23, 2024 3:03 PM
To: Statements
Subject: Statement of Position Submitted by Ruth Hubbard Lovinsohn

Statement of Position Submitted

Name

Ruth Hubbard Lovinsohn

Email

rlovinsohn@gmail.com

Docket

E100Sub190

Message

Please help our state protect future generations with investing in renewables like solar, and STOP investing in nuclear, coal, oil or gas depen

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May 23 2024

Grant, Lakisha

From: John Drake
Sent: Thursday, May 23, 2024 1:18 PM
To: Statements
Subject: Statement of Position Submitted by John Drake

Statement of Position Submitted

Name

John Drake

Email

johndrake7165@gmail.com

Docket

Docket Number: E-100 Sub 190

Message

Under NC WARN's Sharing Solar proposal: There would be no up-front cost for customers to add solar plus battery storage. It would be funded through the Rate System – just as we now all pay for dirty power. Local solar-with-storage can expand across NC quickly, inexpensively and equitably – with a priority on disadvantaged communities. All homes, businesses, nonprofits benefit in many ways – even if they don't have solar themselves. It avoids the year-after-year rate hikes in Duke Energy's high-risk plan to keep expanding fossil fuels and building experimental nuclear reactors.

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May 23 2024

Grant, Lakisha

From: Lenore Yarger
Sent: Thursday, May 23, 2024 12:35 PM
To: Statements
Subject: Statement of Position Submitted by Lenore Yarger

Statement of Position Submitted

Name

Lenore Yarger

Email

bigmaple2@gmail.com

Docket

E-100 Sub 190

Message

Please reject Duke Energy's proposal that would hurt rooftop solar and prolong the use of fossil fuel and fracked natural gas, both extreme contributors to rising global temperatures. Our state is already suffering from rising oceans and temperatures. We cannot wait any longer to take strong action against carbon emitting energy production. Instead, we need policies that will expand local storage-with-solar across North Carolina. It's the quickest, cheapest and most equitable way to phase out fossil fuels and it benefits all homes, businesses, churches and other nonprofits – even if they don't have solar themselves. Storage-with-solar would serve us even in emergencies when the grid fails and would create new jobs in many different locations.

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May 23 2024

Grant, Lakisha

From: Cynthia Sidner
Sent: Thursday, May 23, 2024 11:26 AM
To: Statements
Subject: Statement of Position Submitted by Cynthia Sidner

Statement of Position Submitted

Name

Cynthia Sidner

Email

cynthiasidner@yahoo.com

Docket

E100-Sub190

Message

We installed 30 solar panels in 2018, with the incentives offered that included net metering. We wanted to do our part to reduce fossil fuel consumption and CO2 in the atmosphere, but would not have been able to afford to install solar if it would not, over the long term reduced our electric bill. Eliminating net metering will halt residential solar installation. It only makes sense to encourage roof top solar, not prevent it. Residential solar is also a hedge against terrorist attacks on our grid, and should be encouraged for that reason. Duke energy should do its part to reduce CO2 in the atmosphere, by allowing net metering. I also support nuclear energy production to insure the continual supply of electricity to consumers.

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May 23 2024

Grant, Lakisha

From: melissa lomax
Sent: Thursday, May 23, 2024 10:49 AM
To: Statements
Subject: Statement of Position Submitted by melissa lomax

Statement of Position Submitted

Name

melissa lomax

Email

misslomax70@gmail.com

Docket

E100 Sub 190

Message

Reject Duke Energy's climate wrecccking plan. Support solar plus storage!

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May 23 2024

Grant, Lakisha

From: Clyde Zuber
Sent: Thursday, May 23, 2024 2:36 AM
To: Statements
Subject: Statement of Position Submitted by Clyde Zuber

Statement of Position Submitted

Name

Clyde Zuber

Email

zuber_fowler@yahoo.com

Docket

E-100 Sub 190

Message

I already have updated my home for climate change, but solar/wind should be the direction for NC, not the direction Duke Energy is leading us toward.

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May 23 2024

Grant, Lakisha

From: Stephanie I Hernaiz
Sent: Thursday, May 23, 2024 1:36 AM
To: Statements
Subject: Statement of Position Submitted by Stephanie I Hernaiz

Statement of Position Submitted

Name

Stephanie I Hernaiz

Email

stephanieih@yahoo.com

Docket

E-100 Sub 190

Message

I want to press the Utilities Commission to reject Duke Energy's climate-wrecking plans and pursue climate solutions that work.

OFFICIAL COPY

May 23 2024

Grant, Lakisha

From: Matthew Mayers <mlmayers@gmail.com>
Sent: Thursday, May 23, 2024 1:50 PM
To: Statements
Subject: Consumer Statement for Docket E-100 Sub 190

To: North Carolina Utilities Commission

From: Matthew Mayers, Winston-Salem, NC

Re: Docket E-100 Sub 190 (Duke Energy CPIRP)

Dear Commissioners:

Thank you for the opportunity to express my concerns about the ongoing proceedings for the CPIRP here in North Carolina.

As you know, HB 951 calls upon the Commission to devise a plan to reduce the overall emissions of our electricity grid by 70% (compared to 2005 levels) by 2030, and to full carbon neutrality by 2050. Though there is some flexibility built into the law, the proposals we are seeing from Duke Energy push back the timeline of decarbonization far more than any scenario envisioned in the statute.

I would like to address several main points of concern, as follows.

1. Statutory goals and timeframes

Duke Energy proposes plans that would not reach the 2030 benchmarks until 2035. In reality, Duke's actual date of compliance wouldn't be until 2037, if we count the emissions that will be produced by a gas-fired generation station in South Carolina to be used to serve North Carolina markets. This delay is not justified by the statute or the circumstances. Duke should be required by the Commission to devise a plan that complies with the law, not one that they simply prefer.

2. Least-cost provisions

HB 951 stipulates that meeting grid decarbonization goals will be subject to least-cost provisions that govern all planning for grid resources. As you know, achieving a goal through the least-cost mechanism does not mean changing the goal when it doesn't suit you. We do not expect, nor would we tolerate, any plan that sets aside reliability and adequacy targets for the electricity sector. We pay to achieve those goals, and do so in the way that is most cost-effective. We do not approach goals by saying we will do whatever is cheapest and hope everything works out for the best. Similarly, HB 951 set forth decarbonization goals that must be attained. They should be attained at the least possible cost, but not simply eroded to keep costs down. Put another way, least cost is a pathway, not a goal in its own right.

3. Accurate cost projections

Many commenters have noted that Duke's cost estimates for their planning purposes simultaneously inflate the projections for wind and solar installations, while providing unrealistically optimistic projections for nuclear power and future conversions of gas plants to hydrogen fuel readiness. With no justification, Duke adds a 20% premium to costs for renewable energy sources like wind and solar. These numbers should not be taken at face value, since they do not align well with market data from the rest of the country. Is it possible that Duke wishes to put their thumb on the scale against renewables because many solar resources would be owned by third parties?

In mirror image, Duke estimates the costs for building new nuclear facilities at around half of what seems realistic based on market data. While this comment does not seek to attack nuclear power in principle, it seems clear that a good plan should use good market data to project costs. Recent restrictions on the importation of Russian uranium, even if not durable, certainly throw uncertainty into the situation and make planning for major nuclear deployment an inadvisable strategy for now. Hopefully, all of these situations will be resolved in a positive way, but until that happens, we should not allow Duke to plan to risk ratepayer money on what looks like a longshot at present.

In the case of proposed new gas generation, Duke's projections assume the capacity to convert to hydrogen as a fuel in the coming decades. It is certainly not clear yet that that will be possible, let alone economical. Abundant supply of clean hydrogen is not available, and it appears irresponsible to propose constructing new fossil fuel generation before we know that full decarbonization will actually be within reach in accordance with the requirements of HB 951. If such hydrogen supply does not become available on the necessary timeline, the new gas plants will either become stranded assets that ratepayers will have to finance through our electricity bills, or they will require upgrades with carbon capture technology.

If Duke wishes to take a modest risk on deploying technologies whose future is still unclear, it should do so in a way that does not imply new carbon emissions along the way. For instance, a few small enhanced geothermal sites, while not a sure thing, could prove to be extremely valuable as flexible baseload power, without the downside of associated emission. Similarly, deployment of inexpensive flow batteries could increase the capacity of the grid to absorb new renewable generation.

"Meeting Growing Electricity Demand Without Gas" is a recent report from Energy Innovation that outlines ways to approach this problem, while staying on track to meet decarbonization goals.

Download the report here: <https://energyinnovation.org/publication/meeting-electricity-demand-without-growing-gas/>

4. New EPA rules

Given the new final rule from EPA governing emissions from coal-fired plants and new gas-fired plants, it makes more sense now than ever before to deploy more renewables and reduce or eliminate deployment of gas assets. At the very least, Duke should delay plans for new gas plants by several years

to gain clarity on the economics of carbon capture and sequestration. In this nascent market, it is ratepayers rather than the company, who would bear all the risk of unforeseen costs or timelines.

It is difficult to overlook the fact that Piedmont Natural Gas is a wholly owned subsidiary of Duke Energy when one considers the undue favor with which Duke seems to view construction of new gas generation. In this complex dance of policy, politics, and economics, it is not lost even on casual observers that PNG's need to justify new pipeline construction depends upon demonstrating a need to supply a demand. Is this a kind of self-dealing, in which Duke and its subsidiary cooperate to push for the expansion of the gas industry, despite compelling evidence that this is not in the best interest of ratepayers?

5. Ratebasing grid enhancements

To the fullest extent possible, NCUC should require Duke to invest in Grid Enhancing Technologies, reconductoring, and demand management in order to get more out of our existing grid, while we continue to expand it as quickly as possible. FERC determinations should make this easier to accomplish. In a novel approach to ratemaking, NCUC could, for instance, include not only the relatively modest costs of GETs expenditures, but also a percentage of the avoided equity investments brought about by these smarter expenditures. Duke provides a crucial service to our state, and it is foolish to behave punitively toward the company's interests. Allowing Duke to remain financially robust while aligning their incentives with the interests of ratepayers can produce the best outcomes for adequacy, reliability, and also environmental stewardship.

6. Addressing demand growth

In many markets, utility companies have revised their estimates for demand growth in the coming years, based on several factors. While it is true that demand growth is finally upon us after many years of flat demand, it is also important to take mitigating factors into account.

First, historical data shows that utilities general overestimate demand growth, on average by more than two percentage points. This is especially true in the case of investor-owned utilities, whose incentives are aligned with overbuilding. Concerns about adequacy should, of course, take the front seat in planning, but in order to adhere to the principal of least cost achievement of goals, we need to ask if figures are potentially being padded, or perhaps inadvertently double-counted. For instance, if a large industrial customer is seeking additional capacity within the service area, but also inquiring in other areas to determine where to site a particular facility based on costs and compliance with internal decarbonization needs, it is likely that both utilities are counting that load as new demand. Obviously, only one service area will actually need to accommodate the new load. Rather than counting one-to-one on all inquiries, Duke should be required to determine when some potential load could go elsewhere, and then apply a multiplier that accounts for probable outcomes.

Second, much of our new capacity needs could be met at low cost and relatively quickly through reconductoring, dynamic line rating, and other grid-enhancing technologies that are now more favorably viewed by FERC. For instance, reconductoring of any length no longer requires NEPA review, making it perhaps one of the most cost-effective methods of dealing with capacity increases (when paired with new renewable generation and storage and/or demand response management).

A recent white paper by S&C, entitled "The Distribution Grid Can Be the Hero of the Energy Transition" provides insights into how to manage the transition without undue reliance on old ways of thinking that depend too heavily on fossil fuel power generation.

See: https://19545844.fs1.hubspotusercontent-na1.net/hubfs/19545844/White%20papers/S&C_Electric%20Whitepaper.pdf?__hstc=213470795.dd065f1d95d1c1b62b479fd65a012681.1681615907472.1715184123009.1715258150362.90&__hssc=213470795.1.1715258150362&__hsfp=1245837078

In conclusion, it is imperative that NCUC comply with statutory requirements established by HB 951. Decarbonizations goals are neither optional nor secondary under the law. We should achieve those goals at least possible cost, but not erode them for the convenience of the utility company.

Grant, Lakisha

From: Thomas Welsh
Sent: Wednesday, May 22, 2024 7:06 PM
To: Statements
Subject: Statement of Position Submitted by Thomas Welsh

Statement of Position Submitted

Name

Thomas Welsh

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welshtr@yahoo.com

Docket

E-100 sub190

Message

The Utilities Commission must reject Duke Energy's climate-wrecking plans and pursue climate solutions that work!

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May 23 2024

Grant, Lakisha

From: Mandel Watty
Sent: Wednesday, May 22, 2024 7:32 PM
To: Statements
Subject: Statement of Position Submitted by Mandel Watty

Statement of Position Submitted

Name

Mandel Watty

Email

wattystephen@gmail.com

Docket

E-100 Sub 190

Message

Please don't let Duke monopolize solar energy for North Carolinians trying to ease the impact on our planet

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May 23 2024

Grant, Lakisha

From: Lee Nackman
Sent: Wednesday, May 22, 2024 7:48 PM
To: Statements
Subject: Statement of Position Submitted by Lee Nackman

Statement of Position Submitted

Name

Lee Nackman

Email

lee@nackman.com

Docket

E-100 Sub 190

Message

Reject Duke Energy's plans to build new gas-fired generating plants. Instead, let's build a modern, distributed energy supply system for NC's future, using renewables distributed close to where the energy is needed along with battery storage for when it is needed. By doing this, we can avoid a lot of the expensive grid upgrades that would otherwise be needed.

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May 23 2024

Grant, Lakisha

From: Patty F Daniel
Sent: Wednesday, May 22, 2024 8:28 PM
To: Statements
Subject: Statement of Position Submitted by Patty F Daniel

Statement of Position Submitted

Name

Patty F Daniel

Email

pattyfletcherdaniel@gmail.com

Docket

Docket Number: E-100 Sub 190

Message

The solution to climate change is already at hand - rooftop solar plus battery storage. It is time for the NC Utilities Commission to move into the 21st century! Please help the citizens of North Carolina access rooftop solar through using rate payers fees to help with up-front costs. Thank you.

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May 23 2024

Grant, Lakisha

From: Barbara Tuset
Sent: Wednesday, May 22, 2024 8:55 PM
To: Statements
Subject: Statement of Position Submitted by Barbara Tuset

Statement of Position Submitted

Name

Barbara Tuset

Email

Btuset@gmail.com

Docket

E-100 Sub 190

Message

Please consider our climate future in your decisions over Duke Energy's move to build new carbon-fueled polluting emitting power plants. I know the shift to carbon-free power is complicated but it MUST start somewhere. NC is a perfect place to support new, green technologies that provide new high paying jobs while doing SOMETHING to slow the warming of our planet. It's time to innovate, not drag our feet clinging to the polluting technologies that put us in this unhealthy situation.

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May 23 2024

Grant, Lakisha

From: Jessica Haines
Sent: Wednesday, May 22, 2024 8:56 PM
To: Statements
Subject: Statement of Position Submitted by Jessica Haines

Statement of Position Submitted

Name

Jessica Haines

Email

jeceha65@gmail.com

Docket

E-100 Sub 190

Message

Dear NCUC, As you close public comment for Duke Energy's consolidated docket E-100 Sub 190, we urge you to put communities and the climate first. Communities living in the shadow of dirty power plants have already paid dearly for our reliance on energy sources that are not clean – suffering serious harms to their health, air, and water. To ensure a just transition, a carbon plan must acknowledge the role these facilities continue to play in communities across North Carolina and ensure their voices are heard in visioning a clean energy future. Building new gas infrastructure and increasing our reliance on fracked gas to generate electricity risks climate catastrophe due to fugitive methane, threatens to saddle ratepayers with billions in stranded costs, puts us at the mercy of gas price volatility, and requires destructive pipelines that may never be permitted. We urge Commissioners to agree to a final carbon plan that is in the public interest. Please put equity, clean energy, and a swift transition away from fossil fuels at the center of the North Carolina carbon plan.

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May 23 2024

Grant, Lakisha

From: Paul Forshey
Sent: Thursday, May 23, 2024 9:55 AM
To: Statements
Subject: Statement of Position Submitted by Paul Forshey

Statement of Position Submitted

Name

Paul Forshey

Email

prforshey@gmail.com

Docket

E-100 sub 190

Message

I support solar power and believe net metering should continue along with increased solar plus storage at residential facilities. Please do not create policies that hamper on site solar solutions

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May 23 2024