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February 7, 2022

Ms. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Re: Docket No. E-100, Sub 179 Carbon Plan of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC (together, "Duke"), Pursuant to Session Law 2021-165 Appalachian Voices Letter Regarding Stakeholder Meetings

Appalachian Voices, Intervenor in the above docket, pursuant to the Order Requiring Updates on Stakeholder Meetings issued by the Commission on January 21, 2020, appreciates the opportunity to comment on the sufficiency of the Carbon Plan stakeholder process. Due to unforeseen complications we submit this letter in lieu of providing a presentation at the Commission's February 7, 2022 Staff Conference, as originally planned. This letter is being filed and served upon all parties to this docket.

Appalachian Voices believes all communities have a voice that deserves to be heard, and that everyone deserves access to clean, affordable, reliable electricity. Transparent, accessible and democratic processes are critical to achieving that vision. Environmental and racial justice are critical aspects of the work we are engaging in through the carbon planning process and all related processes.

We have participated in the 2019 Duke Energy Carolinas rate case, the Clean Energy Plan stakeholder process, and more recently the Comprehensive Rate Design and Low-Income Affordability Collaborative processes. In each of these, our goal has been to advocate for solutions that move us toward a more affordable, clean and equitable energy system.

We were extremely excited to attend the first North Carolina Carbon Plan stakeholder meeting, and to be working with Great Plains Institute ("GPI"), Duke Energy, and other stakeholders towards a common goal. We greatly appreciate the information presented during that first meeting, and offer the following thoughts and recommendations in continued effort towards good faith collaboration.

First, it was encouraging to see a broad group of stakeholders present at the meeting. However, proactive outreach to and engagement with marginalized communities and groups from across the state are still needed to ensure an even more inclusive group is present. We commend all parties on committing to keeping this process open so that both groups and individual ratepayers can participate. However, for groups unfamiliar with utility commission proceedings, who lack access to reliable broadband, or are otherwise unfamiliar with our state's carbon reduction goals, we must do more to ensure an inclusive process. Proactive outreach is the responsibility of Duke Energy, GPI, the Commission and the Public Staff.



We ask that the Commission require a more proactive outreach to low-to-moderate income customers, hurricane impacted communities, Spanish speaking communities, and other impacted stakeholders to ensure that even if they are not aware of ongoing proceedings or processes, that their voices and interests are included in a conversation that directly impacts their everyday lives.

Additionally, we are encouraged that both GPI and Duke Energy have expressed a commitment to an actively participatory process, but found the amount of time allotted for questions, comments, and feedback from stakeholders to be too short to incorporate the breadth of the dialogue. We ask that Duke and GPI expand the time for question and answer sessions, to receive and respond to stakeholder concerns about process, and to address “chat” comments to encourage more collaboration.

Additionally, the creation of an open space does not do enough to encourage active and open participation from represented stakeholders. The format of the meeting, and the way content is presented have critical impacts on the effectiveness of these efforts. While we appreciate the thoroughness and breadth of the information presented at the first stakeholder meeting and the facilitators sending out the topics for discussion a week in advance, it can be difficult for community members to stay engaged with extended presentations on critically important, yet highly technical information without having more information readily available to their disposal. For future meetings, we ask facilitators to send slides and a more thorough outline of the meeting to participants no fewer than 5 business days in advance. This additional time would allow all parties to better prepare, and to more intentionally and meaningfully engage in the discussion.

Finally, stakeholder meeting reports to the Commission should include the raw chat box comments made during the meeting, rather than a refined, boiled down version. A lot of important comments were made in the chat box during the meeting that were not included in the report from Duke Energy. These comments should be part of the public record and we request that GPI submit as part of the record the recording of comments that was provided to participants following the meeting.

We reaffirm our commitment to this process and our appreciation of all parties, specifically The North Carolina Utilities Commission, Great Plains Institute, and Duke Energy for the role they’ve played in creating a space where we can all work towards a collective goal. We appreciate the privilege to engage with all parties present and hope these comments reflect our commitment to make this process as positive, productive, inclusive and equitable as possible. Thank you for your time.

Sincerely,



Rory McIlmoil
Appalachian Voices