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February 11, 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"), Carbon Plan Process

Dear Commissioners and NCUC Staff Members,

Appalachian Voices, Intervenor in the above docket, provides the following comments in follow up to questions raised by Commissioners McKissick and Brown-Bland during the Commission's February 7, 2022 Staff Conference. We appreciate this opportunity to respond, and apologize that we were not able to participate more fully in the conference call due to unforeseen circumstances.

Q1: (McKissick) – Does Appalachian Voices have any specific suggestions as to how better to engage low-income, Spanish speaking and other communities not currently engaged?

We believe that the Commission should expand outreach to communities not currently engaged via the creation of a full-time community engagement position housed within the Utilities Commission staff, whose primary responsibility would be to oversee engagement with key groups and constituencies that the Commission wishes to engage with. Community engagement is a continuous process and relies on relationship and trust building.

The Commission may also select to collaborate with other state organizations that provide services or are actively engaged in outreach to underserved communities in order to facilitate outreach and engagement around the Carbon Plan process. For instance, the NC Department of Environmental Quality (DEQ) has a Title VI and Environmental Justice Coordinator that may serve as a supportive resource in expanding engagement to impacted communities. DEQ has also produced a Public Participation Plan that, among other useful recommendations, provides guidance specifically on "Enhanced Engagement Methods to Reach Underserved Communities."¹ That guide may serve as a useful tool for the Commission.

We recognize that authentic engagement with Spanish-speaking communities goes beyond translation, but we find it absolutely necessary that materials housed on the Carbon Plan website at the very least be translated into Spanish, and that meeting recordings be uploaded with Spanish subtitles as well. Further, outreach to groups

¹<https://deq.nc.gov/outreach-education/environmental-justice/public-participation-plan-and-limited-english-proficiency>



working more directly with Spanish-speaking communities to understand barriers to participation would be necessary. We are happy to provide specific examples of groups we're familiar with. In conjunction with the Public Participation Plan, DEQ also published (on the same website) a "Limited English Proficiency [LEP] Language Access Plan," which is intended to provide DEQ staff with "resources and a protocol for interacting with identified LEP individuals or communities." We recommend the Commission and Duke Energy review and consider implementation of the LEP Plan.

We further recommend conducting an assessment whose goal would be to identify key stakeholders that are missing, priority issues for these constituencies, as well as important members of the community who can serve as liaisons and trusted communicators would also create avenues for information to be shared and feedback collected.

Finally, we recognize that it is firmly not the fault of the Commission, Great Plains Institute or Duke Energy that gaps in reliable broadband coverage persist. However, holding a handful of public input sessions in key geographic areas across the state would provide those who struggle to access online proceedings the opportunity to participate.

Q2: (Brown-Bland) – I appreciate Appalachian Voices' suggestion that agenda and meeting materials be provided 5 days in advance to facilitate discussion. Would that be a limitation on discussion?

We don't believe so. It is our hope that allowing participants to view discussion topics and slides in advance would promote discussion and allow for participants to more intentionally and informatively engage in the stakeholder discussions and Q&A sessions. We recognize the facilitators may make edits in the period between sending materials to participants and the actual presentation. Our hope is that by having the opportunity to view discussion topics and materials in advance, individuals might be able to enter the meeting with a better understanding of where they are already unfamiliar with information, need further assistance or clarification, or where their own thoughts agree or conflict with that of the facilitators or Duke Energy. It is our thought that the relatively short amount of time dedicated to discussion is more of a barrier than the format.

We are open to further discussion in ways all parties involved can engage more intentionally (small groups discussions, alternative mediums of providing feedback, etc.) and that more active participation can be achieved.

Sincerely,



Rory McIlmoil
Appalachian Voices