

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1283
DOCKET NO. E-7, SUB 1259

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
)	
Joint Petition of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, to Request the Commission to Hold a Joint Hearing with the Public Service Commission of South Carolina to Develop Carbon Plan)	COMMENTS OF CAROLINAS CLEAN ENERGY BUSINESS ASSOCIATION

NOW COMES the Carolinas Clean Energy Business Association (“CCEBA”) and files these initial comments on the Joint Petition of Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together with DEC “Duke Energy”) to request the Commission to Hold a Joint Hearing with the Public Service Commission of South Carolina to Develop Carbon Plan (“Joint Petition”). In the Joint Petition, DEP and DEC seek to have the North Carolina Utilities Commission (“Commission”) and the South Carolina Public Service Commission (“PSC”) “undertake a coordinated joint proceeding in furtherance of the Companies’ continuing energy transition to reduce carbon emissions in the Carolinas.”

In October 2021, the North Carolina General Assembly passed Session Law 2021-165 (“House Bill 951”), Part I of which imposes a mandate upon the Commission to adopt by December 31, 2022 a Carbon Plan that will achieve a seventy percent (70%) reduction of carbon dioxide emitted by Duke Energy’s generation fleet within the State relative to 2005 levels by 2030 and carbon neutrality by 2050, and to achieve those reductions in the least cost manner. This Joint Petition, and the companion Petition in South Carolina (SC PSC Docket No. 2021-349-E) followed. CCEBA agrees with DEC and DEP that, based on the companies’ cross-border territories, “a well-planned and coordinated energy transition is of vital importance to their customers in both North

and South Carolina.” (Duke Energy Petition at 3.) The companies’ actions in each state will necessarily impact their ability to meet the legislative and administrative objectives of the other. However, without input from the PSC, it is unclear whether the proposal put forth in this Joint Petition is acceptable or workable. CCEBA therefore takes no position on the Joint Petition.

CCEBA further notes that the PSC has set January 31, 2022 as the deadline for filing initial comments and February 22, 2022 as the deadline for filing reply comments in docket 2021-349-E. Whatever its decision on the Joint Petition, CCEBA encourages the Commission to monitor the process in South Carolina and revisit this issue if the PSC indicates in any Order it enters in docket 2021-349-E, or otherwise, that it has a willingness to cooperate or proceed jointly with this Commission.

In any event, CCEBA urges the Commission to move forward with its Carbon Plan docket (E-100, Sub 179), proceed with any 2022 solar procurements in North Carolina authorized by House Bill 951 or the DEP and DEC 2021 Integrated Resource Plans, and to monitor developments in South Carolina to identify any opportunities for collaboration and cooperation.

Respectfully submitted, this 20th day of December 2021.

CAROLINAS CLEAN ENERGY
BUSINESS ASSOCIATION

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail, deposited in the U.S. Mail, postage pre-paid, or by email transmission with the party's consent.

This the 20th day of December 2021.

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