

April 18, 2024

Shonta Dunston, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

RE: North Carolina Utilities Commission Docket No. E-100, Sub 161 and M-100, Sub 164

Dear Chair Mitchell and Commission Members,

The NC Clean Energy Fund is pleased to provide comments and recommendations to the North Carolina Utilities Commission on the proposed rules to address customer data access issues in Docket No. E-100, Sub 161. Due to the direct impact of data access on the ability to access federal funding opportunities (e.g. Inflation Reduction Act), the need for improved data access rules is even more urgent. We are also filing these comments in Docket No. M-100, Sub 164 as the Commission continues to monitor implementation of federal legislation and seeks input regarding the “identification of actions that may be appropriate for this Commission to consider taking in order to facilitate appropriate receipt and deployment of available federal funding within the State.”<sup>1</sup>

The North Carolina Clean Energy Fund (NCCEF) is an independent 501(c)(3) financial institution that operates on the “Green Bank” model successfully pioneered in other states, including Connecticut, New York, and Michigan. NCCEF was formally organized as a nonprofit organization in November 2020, following the culmination of three stakeholder processes in the state that all recommended the development of a green bank/clean energy fund to fill critical financing gaps in the clean energy project landscape.

Our mission is to accelerate investment in clean and efficient energy solutions and increase climate resilience in North Carolina, particularly to the benefit of underserved populations. We partner with public and private investors, foundations and other non-profit organizations to deploy sustainable financing solutions that will create long-lasting environmental, economic and social benefits. NCCEF works with underserved communities, for whom energy costs represent a high proportion of their household budgets, including urban, rural, and tribal communities. We have strong and long-standing relationships across the state, specifically within the communities that are in greatest need of energy burden reduction.

We write to you today as a key partner in the implementation of multiple programs at the State and regional level in North Carolina for which success depends on customers having

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<sup>1</sup> NCUC Docket No. M-100, Sub 164, [Order Allowing Comments Regarding Federal Funding for Utility Service of North Carolina](#), February 2022.

access to their utility energy usage data. Federal funding opportunities are available to the North Carolina State Energy Office (SEO) for which the NC Clean Energy Fund will act as financing partner. These opportunities require the SEO and its partners to analyze customer energy data to verify energy savings and conduct program evaluations. This requirement becomes a significant and unnecessary barrier when utilities do not utilize the U.S. Department of Energy's (DOE) Green Button Connect My Data protocol.

The federal Solar for All program is the largest of these opportunities. This \$7 billion grant program will provide financial and technical assistance to low-income and disadvantaged communities to deploy or benefit from zero-emission technologies, including distributed technologies on residential rooftops, and to carry out other greenhouse gas emission reduction activities.<sup>2</sup> The SEO and partners – including the NC Clean Energy Fund – have applied for \$250 million for low-income rooftop and community solar in North Carolina.<sup>3</sup> These grants are fully funded without local or state match requirements. When successfully implemented, up to 20,000 low-income and disadvantaged households in our state will see increases in the affordability of their electric bills resulting from installation of subsidized distributed solar under the program.

The Solar for All program requires the SEO to demonstrate that program participants will experience “household savings,” defined as a benefit of at least 20% of average household's electricity bill.<sup>4</sup> Insufficient data analysis capabilities risk undermining program efficiency and impact. Previous filings in Docket No. E-100, Sub 161 demonstrate that adoption of the DOE's Green Button Connect My Data protocol greatly simplifies utility customers' access to their own data and the authorized transfer of such data to third parties for analysis. While data may theoretically be available to ratepayers when they create an online account for their utility bill, it is in practice inefficient to access that information in a condensed and simplified way. Further, many of the low-income ratepayers who will benefit from the Solar for All program may have limited internet connectivity and online access, further hindering data access.

The NC Clean Energy Fund is also poised to provide financing to North Carolina businesses, households, nonprofits and farms under the Inflation Reduction Act program, Greenhouse Gas Reduction Fund, worth \$20 billion nationally. These funds will be administered by national-level intermediaries. Capital from those intermediaries is available only to nonprofit lending institutions that can demonstrate strong demand for their financing products. The NC Clean Energy Fund can bring the benefits of this \$20 billion fund to North Carolina only to the extent

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<sup>2</sup> <https://www.whitehouse.gov/wp-content/uploads/2022/12/Inflation-Reduction-Act-Guidebook.pdf> at 22.

<sup>3</sup> Application Executive Summary available at <https://energizenc.com/>.

<sup>4</sup> U.S. Environmental Protection Agency Request for Applications for Solar for All, Funding Opportunity Number EPA-R-HQ-SFA-23-01, Appendix C, available at <https://www.grants.gov/search-results-detail/348957>.

that we can cultivate and connect with a robust pipeline of clean energy projects, such as energy conservation measures for houses of worship, community facilities, affordable multifamily housing developments, and individual households in low-wealth communities. Owners and managers of those buildings are severely hindered in their ability to evaluate the value proposition of energy measures due to the difficulty of accessing their own utility data and sharing that data easily with third-party providers such as engineering firms, energy auditors, and third-party energy managers. Without robust value propositions, my organization is unable to build a pipeline of projects that can be financed on favorable terms using Greenhouse Gas Reduction Fund capital, bringing benefits of clean energy to underserved locations and organizations.

The North Carolina Clean Energy Fund acknowledges the amount of time Duke Energy has put into meeting with stakeholders to improve customers' access to their energy usage data via new billing systems in recent years, and we hope that, as Duke and the North Carolina Utilities Commission work to improve customer access to utility data, the issue of inconsistent access to utility data for customers is resolved to allow them to track energy use and emissions successfully. I appreciate the consideration of these comments by the Commission and hope to continue active collaboration and partnership on the issue of customer data access. Please contact me if you need additional information regarding the federal funding examples included.

Respectfully submitted,

A handwritten signature in black ink, reading "Melissa Malkin-Weber". The signature is fluid and cursive, with the first name "Melissa" being more prominent and the last name "Malkin-Weber" following in a similar style.

Melissa Malkin-Weber, Co-Director  
North Carolina Clean Energy Fund