

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 179

In the Matter of:	)	
Carbon Plan of Duke Energy Progress, LLC	)	
And Duke Energy Carolinas, LLC	)	<b>MAREC ACTION'S</b>
Pursuant to Session Law 2021-165 and 2022	)	<b>INITIAL COMMENTS</b>
Biennial Integrated Resources Plans	)	

**MAREC ACTION'S INITIAL COMMENTS**

MAREC Action (MAREC) appreciates this opportunity to comment in the above-captioned docket on the Carbon Plan of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively "Duke Energy") filed on May 16, 2022, with the North Carolina Utilities Commission. MAREC fully supports and endorses the comments filed today by the Carolinas Clean Energy Business Association (CCEBA) particularly as they related to the matters identified below.

MAREC is a nonprofit organization formed to advance utility-scale renewable energy development within the PJM Interconnection and adjacent areas. MAREC's footprint includes North Carolina and nine other jurisdictions (eight states and Washington, D.C.). MAREC members include utility scale wind, offshore wind, solar and battery storage developers, wind turbine manufacturers and non-profit organizations dedicated to the growth of renewable energy technologies.

MAREC specifically supports CCEBA's positions on the following parts of the Carbon Plan: the unreasonable and unjustified constraint on solar procurements in the Near-Term Execution Plan; the need for comprehensive transmission planning reform; and, the unjustified reliance on the development of Advanced Nuclear and green hydrogen. MAREC also fully supports CCEBA's recommendations to significantly increase the levels of solar in the Near-

Term Execution Plan, including by mandating solar and Solar+Storage; and the need to encourage offshore wind development in North Carolina. Here, MAREC wishes to underscore the need and the benefits of offshore wind, particularly as it relates to achieving the goals and objectives of the Carbon Plan by 2030.

Also, in addition to CCEBA's recommendations for topics to be covered at the evidentiary hearing, MAREC recommends that the following subject be included as well:

**The capability of offshore wind developers to complete their North Carolina projects by 2030** – MAREC anticipates that the non-Duke leaseholders of offshore wind lease areas will contest the need to extend the plan past the 2030 timeline. The Commission should hear testimony on this and statements in the Carbon Plan indicating otherwise.

MAREC intends to fully participate in any evidentiary hearings and appreciates the opportunity to file these comments.

Respectfully submitted this the 15th day of July 2022.

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**CERTIFICATE OF SERVICE**

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

Respectfully submitted this the 15<sup>TH</sup> day of July 2022.

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