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15 Morning Star Dr. Leicester, NC 28748

November 14, 2020

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Re: Docket E-2 Sub 1257

Dear Commissioners:

I am writing to express my strong support for your approval of the proposed 5 MW solar project on a retired Buncombe County landfill in Woodfin, NC. In 2015, Duke Energy made a promise to the Asheville community in connection with closure of the Asheville coal plant to replace it with a new gas plant, 15 MW of solar, five MW of battery storage, and a partnership with the City and County to reduce peak demand to delay or eliminate the need for a new peaker plant. The solar project before you now is an integral part of that promise, and we ask that you approve it despite objections from the Public Staff.

The Sierra Club led the opposition to Duke Energy's initially proposed Modernization Project that included a single, 700 MW natural gas unit and 45 miles of high voltage transmission lines through some of the most beautiful countryside in North Carolina. As the leader of the opposition, and we made it clear that, to gain public support, any new proposal had to include clean energy components. To its credit, Duke listened. Every part of the revised Modernization Project was critical: no transmission lines, smaller gas plant, 15 MW of solar, 5 MW of battery storage, and the partnership to delay or avoid the peaker plant. It was a package deal.

As your order approving the CPCN for the gas plant indicates, you also understood that each of these elements was part of Duke's commitment. Your order states on page 38:

The Commission commends the work that DEP has begun in engaging Asheville community leaders to work collaboratively on load reduction measures. The Commission shall require DEP to continue to update it on these efforts, *along with its efforts to site solar and storage in the western region. As to solar and storage, the Commission expects DEP to file as soon as practicable the CPCN to construct at least 15 MW of solar at the Asheville Plant or in the Asheville region.* The Commission further urges DEP to move forward in a timely manner with the 5 MW storage project in the Asheville region. To the extent DEP does not do so, the Commission reserves the right on its own motion or on the motion of any interested party to investigate DEP's decision not to move forward with its representations. (emphasis added)

Your order further states on page 44:

6. That DEP shall file with the Commission a progress report annually in this docket, and the report shall include actual accomplishments to date on its efforts to work with its customers in the DEP-Western Region to reduce peak load through demand-side management, energy efficiency or other measures, and on DEP's efforts to site solar and storage capacity in the DEP-Western Region, with the first report due one year from the issuance of this order;

And on pages 24-25, in the response to comments section, the order states:

DEP indicated that some Intervenor comments relate to DEP's commitment to renewables. DEP stated that it is committed to pursuing a CPCN for new solar generation in Asheville for a minimum of 15 MW. DEP indicated that the size of the solar facility at the Asheville plant cannot be known until the Asheville coal units are demolished and the 1964 ash basin is excavated. DEP explained that it takes approximately 100 acres for a 15 MW utility-scale solar facility. DEP committed that if the Asheville site configuration does not allow the construction of 15 MW or more of solar generation, it will supplement the on-site solar facility with a combination of rooftop, community, or other utility-scale solar facilities at other locations in the Asheville area.

These excerpts make it clear that everyone - Duke, the Commission, and the Asheville community - understood that solar was part of the deal. It is true that solar projects have to be smaller in the mountains because we do not have large amounts of flat, open land. This means that they could be more expensive than projects built in the eastern part of the state. But if this project cannot be approved for a retired landfill where the land is cheap or even free, then how will Duke ever make good on its promise to us?

This is not just a regular solar project and cannot be analyzed through the regular lens. This is the fulfillment of a promise by Duke that was supported by the Commission. I urge you to approve this project and enable Duke to meet its commitment to our community.

Sincerely,



Judy Mattox

Chair- WNC Sierra Club – 828-683-2176

Cc: Michael Regan, Secretary, Department of Environmental Quality
Jordan Whichard, Director of Intergovernmental Affairs, Office of the Governor
Jeremy Tarr, Senior Advisor for Climate Change Policy, Office of the Governor