

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

<b>In the Matter of:</b>	)	<b>JOINT RESPONSE OF THE</b>
<b>Duke Energy Progress, LLC, and</b>	)	<b>NORTH CAROLINA</b>
<b>Duke Energy Carolinas, LLC, 2022</b>	)	<b>SUSTAINABLE ENERGY</b>
<b>Biennial Integrated Resource Plans</b>	)	<b>ASSOCIATION, SOUTHERN</b>
<b>and Carbon Plan</b>	)	<b>ALLIANCE FOR CLEAN</b>
	)	<b>ENERGY, SIERRA CLUB, AND</b>
	)	<b>NATURAL RESOURCES</b>
	)	<b>DEFENSE COUNCIL TO ISSUES</b>
	)	<b>REPORT</b>

The North Carolina Sustainable Energy Association (NCSEA), the Southern Alliance for Clean Energy (SACE), the Sierra Club, and the Natural Resources Defense Council (NRDC) (NCSEA, SACE, the Sierra Club, and NRDC, collectively, the Coalition of Low-Cost Energy and Net-Zero Intervenors or CLEAN Intervenors) respectfully provide the following joint response to the Issues Report Submitted by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, Duke) on July 22, 2022.

CLEAN Intervenors do not take issue with the list of issues provided by Duke in its July 22 filing. Instead, we are concerned that Duke’s filing could leave the Commission with the mistaken impression that there is general agreement that an evidentiary hearing is required to resolve the disputed issues in this docket. As noted in our Joint Comments submitted on July 15, the Commission holds the power and obligation to develop the Carbon Plan. Accordingly, the Commission may decide to proceed with development of that plan—either by using its own EnCompass license or by retaining a consultant—based on the filings made by the parties, as well as any workpapers and/or modeling files the Commission may require the parties to supply. Rather than entertaining a “battle of the experts” hearing with untold numbers of witnesses and cross from counsel representing

over forty different parties, the Commission could exercise its own expert judgment in determining which inputs and assumptions are most reasonable for purposes of discharging its statutory obligation. Such an approach could allow the Commission to bypass an evidentiary hearing altogether, and instead spend the remaining months of 2022 in crafting its Carbon Plan. The Commission would retain the option of scheduling a series of technical conferences in which witnesses answer Commission questions and the party sponsoring the witness has the opportunity to answer questions on those Commission questions to allow the Commission to delve into those discrete issues that would be most useful in assisting it in developing its carbon plan.

CLEAN Intervenors reiterate this option for the Commission's consideration because Duke declined our request to include this option in its Issues Report.

Respectfully submitted, this the 27th day of July 2022.

/s/ Taylor M. Jones

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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 filing 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 27th day of July 2022.

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