

**From:** [Sanket Kale](#)  
**To:** [Statements](#)  
**Subject:** Statement of Position Submitted by Sanket Kale  
**Date:** Wednesday, December 21, 2022 12:09:13 PM

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## Statement of Position Submitted

### Name

Sanket Kale

### Email

sanketkale@gmail.com

### Docket

E-100 Sub 180

### Message

Governor and NCUC commission, Please work for the public as a public office bearer and reject Duke's proposal. Duke's employees are working for their corporation and they do not need the public officers to serve them. Please serve the public and its best interest. Thank you!  
-Sanket Kale

**From:** [Betsy Bickel](#)  
**To:** [Statements](#)  
**Subject:** Statement of Position Submitted by Betsy Bickel  
**Date:** Wednesday, December 21, 2022 12:15:56 PM

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## Statement of Position Submitted

### Name

Betsy Bickel

### Email

betsybickel@gmail.com

### Docket

E 100, sub 180

### Message

The Utilities Commission should deny Duke Energy's attempt to make rooftop solar more expensive and less accessible to homeowners. This request is solely for Duke's profit at the expense of ratepayers and our shared climate and environment. You have a duty to protect the public. Please do it.

**From:** [Tim Holder](#)  
**To:** [Statements](#)  
**Subject:** Statement of Position Submitted by Tim Holder  
**Date:** Wednesday, December 21, 2022 12:31:29 PM

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## Statement of Position Submitted

### Name

Tim Holder

### Email

timholder@verizon.net

### Docket

E-100 Sub 180

### Message

North Carolina regulators must reject a Duke Energy plan to impose new fees and onerous requirements on residential solar customers, says a coalition of advocacy groups. They say the plan ignores a state law that requires an assessment of solar's benefits and would harm the rooftop solar industry and all state power users. New fixed fees for solar customers lead to rates that discriminate against them and raise legal questions, the groups said in a joint brief and proposed partial order they filed with regulators last Friday. The coalition includes the Environmental Working Group, NC WARN, Sunrise Durham, 350 Triangle, 350 Charlotte, the NC Climate Solutions Coalition, the NC Alliance to Protect Our People and the Places We Live and retired chemical engineer Donald Oulman. Duke is asking the North Carolina Utilities Commission, or NCUC, to impose a new minimum monthly bill as part of the net energy metering (NEM) policy that applies to rooftop solar owners within Duke's service areas. Duke's two monopoly utilities in the state, Duke Energy Carolinas and Duke Energy Progress, would charge solar customers minimum bills of \$22 and \$28, respectively. What Duke proposes is WRONG> he advocacy groups say the NCUC has failed to comply with a state law known as House Bill 589, which requires a cost-benefit analysis of rooftop solar. Their joint brief states: House Bill 589 sets forth a requirement that the Commission perform an investigation of the costs and benefits of customer-sited generation, including NEM.... In contradiction of the requirements of House Bill 589, [Duke Energy] would have this Commission impose a new NEM tariff based upon an in-house Embedded and Marginal Cost Study. This is precisely the type of one-sided study that House Bill 589, which requires an investigation, was intended to prohibit. House Bill 589 became law in 2017, but the commission did not conduct such a study, instead relying on Duke's own flawed and one-sided internal review to justify its proposed NEM tariff, which essentially imposes a solar tax. The failure to conduct this assessment clearly violates state law, the brief says. Duke Energy has argued against a commission-led study. "Under the state's law, it is crystal clear the commission must conduct its own cost-benefit analysis for rooftop solar," said EWG Senior Energy Policy Advisor Grant Smith. "Anything less, especially relying on Duke's own deeply

flawed and one-sided study, violates the statute and ignores solar's clear benefits." "The utilities commission hasn't done a study of this change to rooftop solar, as required by law," said Ziyad Habash, from Sunrise Durham. "Here's what they'd find if they'd done the study: Promoting independent solar is better for North Carolina than letting Duke Energy run wild with fracked gas projects. "Sunrise Durham will continue to press the utilities commission for a pro-solar verdict in this docket," Habash added. In its own filing with the NCUC, the Attorney General's Office agreed that Duke's internal study does not satisfy the statutory mandate to investigate costs and benefits, noting that, while it investigated the costs, "it did not analyze potential benefits . . . [which] are many—from reducing carbon emissions by offsetting fossil fuel generation to improving grid resilience—and they should be studied and quantified." The solar plan might also run afoul of the federal Public Utility Regulatory Policies Act (PURPA), the groups warned. Under that law, the NCUC is prohibited from imposing differing rates on small rooftop solar customers than are charged to other customers with similar usage patterns. However, Duke's proposed tariffs would burden NEM customers with many new charges that other low-usage non-solar customers would not be required to pay. This discrimination against rooftop solar is prohibited by PURPA. "Just because Duke would prefer regulators violate state and federal law by rubber-stamping its proposed solar tax on customers doesn't mean they should," said Smith. These same advocates urged the NCUC in June to hold a full evidentiary hearing to examine these statutory violations and other issues. "We are very concerned that the commission refused to make Duke officials answer its critics under oath," said Jim Warren, Executive Director of NC WARN. "This issue is at the core of whether North Carolina finally joins the clean energy revolution or allows Duke Energy to keep stifling renewables and building climate-wrecking gas-fired power plants."

**From:** [Keval Kaur Khalsa](#)  
**To:** [Statements](#)  
**Subject:** Statement of Position Submitted by Keval Kaur Khalsa  
**Date:** Wednesday, December 21, 2022 12:34:36 PM

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## Statement of Position Submitted

### Name

Keval Kaur Khalsa

### Email

keval.khalsa@duke.edu

### Docket

E-100 Sub 180

### Message

Please reject Duke Energy's net metering proposal. This proposal does not comply with a state law known as House Bill 589 or PURPA, the federal Public Utility Regulatory Policies Act. Duke Energy is attempting to stifle rooftop solar at a time when this technology is desperately needed and part of the solution to the climate emergency that we are facing in NC and the world. As a Duke ratepayer who has invested in rooftop solar on my home because I want to part of the solution to the climate crisis, I demand that the Utilities Commission do its job to protect citizens and the environment we all depend upon for survival.