



April 25, 2024

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Via Electronic Filing

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

Re: Environmental Defense Fund's Letter In Lieu of Comments
NCUC Docket Nos. E-100, Sub 179 & E-100, Sub 190

Dear Ms. Dunston:

On behalf of Environmental Defense Fund ("EDF"), an intervenor in North Carolina Utility Commission Docket No. E-100, Sub 190, and pursuant to the North Carolina Utilities Commission's ("Commission") April 22, 2024 *Order Requesting Comments on the Public Staff's Motion Requesting Issuance of Commission Order* ("Order"), I hereby submit this letter, made in lieu of comments, in response to *Public Staff's Motion Requesting Issuance of Commission Order* filed in the instant docket by the North Carolina – Public Staff ("Public Staff") on April 17, 2024 (the "Motion").

EDF supports the request of the Public Staff for the Commission to issue an order expediting the procurement process for offshore generation resources. Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC's ("DEP") (DEC and DEP, collectively, "Duke") analysis has forecasted the need for *at least* 2.4 GW of offshore wind generation to meet the interim carbon emissions reduction requirement and an unnecessary delay of the procurement process may endanger Duke's ability to meet the interim carbon emissions reduction requirement.

Therefore, in order provide the best opportunity for Duke to meet its carbon emissions reduction requirements in a timely manner, EDF supports the expeditious procurement of offshore wind energy resources to provide carbon-free renewable energy to North Carolina and, in particular, supports the Public Staff's Motion requesting an order requiring an expedited procurement process.

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Best regards,

/s/ Benjamin W. Smith
Benjamin W. Smith
Counsel

cc: Parties of Record