



March 30, 2022

Ms. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Re: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's
2020 IRP Supplemental Portfolio B
Docket No. E-100, Sub 165

Dear Ms. Dunston,

The Carolinas Clean Energy Business Association ("CCEBA"), Intervenor in the above docket, submits this letter in lieu of comments pursuant to the *Order Allowing Comments and Reply Comments on IRP Supplemental Filing* issued by the North Carolina Utilities Commission ("Commission") on March 18, 2022.

CCEBA has reviewed the February 9, 2022, filing by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (together, "Duke Energy") entitled "2020 IRP Supplemental Portfolio B – Limited Appalachian Gas Availability and Modified Gas Forecasting Assumptions." While the 2020 IRP and this supplemental filing address important issues, CCEBA believes that the upcoming proposed Carbon Plan and the subsequent responses and Commission determinations will be the proper format, and Docket No. E-100, Sub 179 the proper forum, for further discussion of these matters.

Nevertheless, CCEBA notes the following matters on which it would appreciate further response from Duke Energy:

- (1) Battery Assumptions – It is unclear from Duke Energy's filing what assumptions were used to calculate the cost of battery storage in the Supplemental Portfolio. The assumptions in the original IRP were the subject of much comment from CCEBA and other Intervenors, who critiqued the assumptions as too high. If those assumptions were maintained in the development of Supplemental Portfolio B, they would unnecessarily skew the portfolio toward more Combustion Turbines ("CTs") and fewer storage resources, particularly in the years before 2032. CCEBA expects storage resources to be far more cost competitive with CTs than is reflected in the Supplemental Portfolio B. CCEBA also expects this issue to be addressed in more detail during the

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Carbon Plan process.

- (2) CCEBA encourages the Commission and Duke Energy to explore the viability of additional land-based wind resources within the IRP planning horizon in order to address the potential effects of having fewer Combined Cycle (“CC”) units in the portfolio. Such resources could reduce the usage, as shown in the Supplemental Portfolio, of coal or of CTs with oil backup. Again, CCEBA looks forward to analyzing potential resources as part of the Carbon Plan process.
- (3) The solar resources anticipated in Table 2 of the Supplemental Portfolio B in years 2022 through 2030 are insufficient to enable Duke Energy and North Carolina to meet the carbon reduction requirements of House Bill 951. This insufficiency shows that the 2022 Carbon Plan process will require all of these figures to be revisited.
- (4) CCEBA notes that in the cost comparison section of Duke Energy’s filing, Tables 3 and 4 reflect a cost difference between the original Portfolio B and Supplemental Portfolio B with various assumptions about gas delivery availability. To be a true and fair cost comparison of the various scenarios, forecast gas *prices* in the original Portfolio B should be adjusted. The Tables in Supplemental Portfolio B were not updated in this way, resulting in an apples to oranges comparison. In any event, the unpredictability of future options for additional gas supply should be taken into account in this docket as well as the Carbon Plan.

CCEBA appreciates the opportunity to address these issues and reserves the right to reply to comments from other stakeholders and the North Carolina Public Staff. CCEBA further looks forward to continued engagement with Duke Energy and all stakeholders in the 2022 Carbon Plan process, where most of these issues will necessarily be addressed further. This letter is being filed and served upon all parties to this docket.

Respectfully submitted,

/s/John D. Burns

General Counsel

Carolinas Clean Energy Business Association

N.C. Bar No. 24152

