



From: NC Conservation Network et al.  
Subject: Carbon Plan Process  
Date: 2/18/2022

Dear Chair Mitchell & Commissioners,

We appreciate the Commission's careful supervision of the Carbon Plan stakeholder process to date and write to follow up on several key points from the February 7th staff conference. As we stated previously, the first Carbon Plan presents a historic opportunity for the Commission to solicit the input of all North Carolinians on the state's clean energy future - it is crucial that stakeholders, even those without the resources to become formal parties of record, are able to ensure that their feedback is incorporated into the draft Carbon Plan.

We thank the Commission for their recognition of this goal, their close attention to the Carbon Plan process thus far and their clear instruction on how non-intervenors can submit written statements. All of the following requests are intended to clarify and build upon the Commission's instructions to date and comments from stakeholders during the February 7th, 2022 Staff Conference.

- **Duke Energy must share modeling inputs and assumptions with stakeholders as part of the stakeholder process, subject to appropriate confidentiality agreements.** It is crucial for stakeholders' understanding of the utility's cost assumptions and inputs that as much modeling data as can be shared publicly is shared in a timely manner. Indeed, in its motion for an extension of time to file its initial Carbon Plan, Duke itself alluded to the benefit of "thorough review and deliberation of critical modeling inputs and input from stakeholders" and the need to "receive material input regarding modeling inputs and assumptions through the stakeholder process." All stakeholders must be able, to the extent practicable, to work off of the same assumptions as Duke and provide feedback on those assumptions.

Sharing of such data should be discussed in detail during the second stakeholder meeting and data, modeling assumptions and third party work on which the utility is relying should be released to stakeholders by March 1, so that stakeholders have an opportunity to discuss and analyze the utility's assumptions prior to working group meetings and before the third and final stakeholder meeting.

- **The utility must share a draft Carbon Plan and incorporate stakeholder feedback on the draft prior to submitting its initial Carbon Plan on May 16, 2022.** The utility's representatives clearly stated their opposition to taking this step during the February 7th staff conference. With due respect to any legitimate technical or bandwidth issues, we submit that it is crucial to provide stakeholders an opportunity to submit substantive feedback on major strategic questions within the Carbon Plan before the formal comment period. Failing to do so would frustrate the General Assembly's directive that the Carbon Plan be developed with stakeholder input, would exclude comment from

stakeholders without the resources to intervene in the formal Commission proceeding, and would undermine public confidence in what the Commission has made clear it intends to be a transparent and accessible process. To that end we propose that a draft Carbon Plan should be shared with stakeholders by mid-April in order to allow for feedback by the end of that month, which could then be incorporated into the draft plan due May 16th.

In alternative, should the Commission agree that sharing a full draft Carbon Plan and incorporating input prior to May 16th is impracticable, we request that the Commission require Duke Energy to share with stakeholders the scenarios that will be included in the Carbon Plan and the preliminary results of modeling.

- **Provide sufficient notice of time and location for public witness hearings.** We recognize and appreciate the advance notice provided by the Commission in its January 21st order regarding three public witness hearings. We write to inquire as to the proposed location and timing of these meetings, in order that stakeholders might have an opportunity to make any suggestions regarding how best to locate or schedule these meetings to solicit public input from low-income ratepayers and communities historically impacted by fossil fuel infrastructure.
- **The utility should post answers to stakeholder questions in a public portal.** As raised in the staff conference on February 7th, the utility and facilitators should, using a public-facing website through which stakeholders and the public can pose questions and the utility can post answers. In addition, near the end of each remaining stakeholder meeting, there should be an opportunity for stakeholders to register questions which were not answered during the course of the meeting for the utility to answer via the portal. Answering questions in this way will save valuable stakeholder meeting time and help to educate those unable to participate in the day-long stakeholder meetings.
- **The utility must provide stakeholders with the information they need to participate, and should do so in a timely manner.** Several stakeholders emphasized the importance of sharing stakeholder meeting agenda and slides in advance. We second these requests. In addition, we request that the utility and facilitator provide a detailed overview of the remainder of the stakeholder process, including proposed meeting agenda and technical group meeting schedules. Providing this information with sufficient advance notice will allow stakeholders to proactively identify any lack of coverage of key areas of concern and bring forward the best thinking and resources in order to maximize the effectiveness of the stakeholder meetings to develop a strong draft Carbon Plan. This overview should be shared with stakeholders as part of the second stakeholder meeting.

We again thank the Commission for their careful oversight of the Carbon Plan process and responsiveness to stakeholder concerns to date, and look forward to continued engagement moving forward.

Sincerely,

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