

Comments for Consideration by the Public Staff
Regarding Intervenor Submittals to Docket E-100 Sub 190: Duke Energy's CIPRP

John Gaertner
jgaertner@carolina.rr.com
1440 Harding Place, Apt 229, Charlotte, NC 28204

I have been reviewing the intervenor submittals to docket E-100 sub 190, Duke Energy's CIPRP. I focused on the comments of AGO, the Public Staff, and SACE et al. They contain a wealth of valuable insights and recommendations. I am hopeful that the Commission and Duke Energy will accommodate many of these elements in the CIPRP ordered in December.

However, I contend that there is a global message that needs to be sent to the Commission and Duke that is lost in the sheer volume of comments that are sometimes conflicting, overlapping, or presented in the most favorable light of a particular intervenor. That global message is:

The Commission can order a set of enhancements that would make the CIPRP a “dynamic process”. It could start out on a single pathway that was a sort of consensus that “balances” the objectives (that is; optimizes cost, reliability, carbon, and risk). Progress would be evaluated throughout the biennial cycle relative to other pathways in the plan, and adjustments would be made to stay on an optimum pathway. The process would evolve over time with better analytics, more data, and better decision algorithms. There would still be disagreements, of course, but their resolution would be centered on facts – data, modeling assumptions, optimization rules – not opinions or self-interest. A panel of experts could be the final arbiters.

No single pathway based on data today can stay optimal, even for a year. Duke's Aug 2023 preferred pathway P3 proved to require updates in January about load forecasting, and should have been revised for emergent issues on SMRs, hydrogen infrastructure, and offshore wind. Emergent events will continue. That's why multiple pathways that optimize diverse objectives are necessary. That's also why plan performance must be continually monitored and adjusted, and why analytics must be continually enhanced. For example, my comments to the E-100 sub 190 docket as an exhibit to my testimony at the Charlotte Public Hearing on Apr 10, 2024, are specifically designed to accomplish this vision (Exhibit docketed Apr 30, 2024).

Surely this vision cannot be realized in one cycle of this CIPRP, but I would settle for getting half the distance to the goal each 2 years.

I hope that the parties – AGO, the Public Staff, SACE et al, and perhaps others – will endorse such a collaborative vision to the Commission and Duke Energy during tis next important phase of this proceeding.