

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 179

In the Matter of:)	
Carbon Plan of Duke Energy Progress, LLC)	
And Duke Energy Carolinas, LLC)	INITIAL COMMENTS
Pursuant to Session Law 2021-165 and 2022)	OF THE NC PORK COUNCIL
Biennial Integrated Resources Plans)	

INITIAL COMMENTS

Pursuant to the Orders issued by the North Carolina Utilities Commission (“Commission”) in the above referenced docket, the North Carolina Pork Council (the “NCPC”) submits the following initial comments on Duke Energy Progresses, LLC and Duke Energy Carolinas, LLC (together “Duke Energy”) Carbon Plan.

The NCPC is encouraged by the inclusion of low carbon fuels in the Carbon Plan, particularly the use of renewable natural gas (“RNG”) as a replacement for conventional natural gas at combined cycled and combustion turbine generation units. It is well known that the use of RNG derived from animal waste to produce electric power is an overall win on many levels – at the farm fostering new management practices with significant benefits dealing with odor, vectors and fugitive emissions; for the environment by eliminating or reducing the potential for overflows or releases; and overall by reducing greenhouse gas emissions that otherwise would be released to the atmosphere. Attached are an analysis performed by the Environmental Defense Fund and a report prepared by the Research Triangle Institute that explain and confirm the substantial benefits of using animal manure, in this case swine waste, to produce RNG used in the generation of electric power, both from the viewpoint of modifying traditional manure management practices and as a substitute for conventional natural gas. Among the other benefits, RNG from animal waste, and particularly from swine waste, is carbon negative and

when used to produce electric power reduces GHG emissions. That is why it makes sense to be part of any carbon reduction plan.

North Carolina is blessed with swine manure material. According to recent data, it ranks third nationally in availability. There absolutely no reason not to optimize on this position. It will be here in any event and using the manure in a very productive way makes absolute sense. Accordingly, the NCPC is glad to see Duke Energy adopt a position and recognizes this situation and the NCPC fully supports the use of low carbon fuels in the generation of electric power.

Thank you for this opportunity to comment. Respectfully submitted this the 15th day of July 2022.

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that all person on the docket service list have been served true and accurate copies of MAREC'S Initial Comments by first class mail deposited in the U.S. mail, postage pre-paid or by email transmission with the party's consent.

Respectfully submitted this the 15TH day of July 2022.

_____/S/_____
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