

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 141

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	NC WARN'S MOTION
2015 Integrated Resource Plans and	)	TO SEEK LEAVE TO
Related 2015 REPS Compliance Plans	)	FILE COMMENTS

PURSUANT TO the Commission's Order Granting Public Staff's Motion which set forth dates for comments on the Integrated Resource Plans (IRPs), now comes the North Carolina Waste Awareness and Reduction Network (NC WARN), by through the undersigned attorney, with a motion to seek leave to file the attached comments.

1. NC WARN is an intervenor in this docket and has filed comments on the last several IRPs, using as the basis for its annual updates of NC WARN's report, A RESPONSIBLE ENERGY FUTURE FOR NORTH CAROLINA.<sup>1</sup> The attached comments are the 2015 update of the report and focus on the IRPs filed by Duke Energy Carolinas and Duke Energy Progress on September 1, 2015. The comments will assist the Commission in its analysis of the IRPs by pointing out several areas requiring closer scrutiny.

2. The most significant change in the 2015 IRPs is the Duke Energy Carolinas IRP presentation of two planning models for the Carolinas, one with

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<sup>1</sup> The NC WARN report, A RESPONSIBLE ENERGY FUTURE FOR NORTH CAROLINA, with the annual updates is available at [www.ncwarn.org/responsible-energy-future/](http://www.ncwarn.org/responsible-energy-future/). The report contains additional citations to the various studies relied upon by NC WARN.

carbon sensitivity and the other with no carbon sensitivity. In the carbon sensitivity model, the additional 11,000 MW of capacity Duke Energy predicts it will need is almost totally through natural gas plants, with the addition of the two proposed nuclear plants at the Lee Nuclear Station in South Carolina. The no carbon sensitivity model eliminates the nuclear plants and replaces them MW for MW with combustion turbines. The apparent replacing of baseload nuclear with plants more commonly used peaking and shoulder periods draws into question the fundamental need for the baseload plants in the Duke Energy IRPs.

3. Even disregarding environmental and social costs, the financial costs from the power plant buildup in the IRP are staggering. This results from the exaggerated forecast 1.5% growth in capacity and 1.2% growth in energy. The financial cost of the natural gas, plus two nuclear units, in the carbon sensitivity model will be in the \$35 billion range over the next 15 years, and the construction costs of the all natural gas plan will be at least \$15 billion over the same time period.

4. The attached comments cite several new studies about the riskiness of natural gas as a fuel for the future. Given that natural gas prices, now low because of fracking, are expected to be extremely volatile over the next decade, Duke Energy's reliance on natural gas is short-sighted. The focus of planning should be how promptly should the coal plants be closed down without any construction of new generating plants, and not a blanket reliance on new natural gas.

5. In addition to concentrating on the high costs associated with the power plant buildup plans, the attached comments address the continued exaggeration of growth of electricity sales. The IRPs continue to disregard the excess capacity in the Southeast, and fail to make strategic power purchases to supplement generation. The comments address the environmental and social costs of using coal and natural gas plants and how they are making the climate crisis worse. Lastly, the comments describe a better path forward, based on competition, energy efficiency, distributed renewable energy, and combined heat and power and other forms of on-site generation.

THEREFORE, NC WARN prays that it is allowed to submit the attached comments for consideration in this matter.

Respectfully submitted, this the 2<sup>nd</sup> day of November 2015.

*/s/ John D. Runkle*

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# CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing NC WARN'S MOTION TO SEEK LEAVE TO FILE COMMENTS and attached comments (E-100, Sub 141) upon each of the parties of record in this proceeding or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This is the 2<sup>nd</sup> day of November 2015.

*/s/ John D. Runkle*

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