



From: NC Conservation Network et al.

Subject: Carbon Plan Process, Docket E-100 Sub 179

Date: 4/12/2022

Dear Chair Mitchell & Commissioners,

We thank you for your oversight of the Carbon Plan process to date and the robust public process you have thus far ordered. We write to request a number of additional steps to ensure transparency and public participation as the Carbon Plan process moves forward.

- 1. Duke should share all non-confidential modeling data with the public via a data room or other public-facing portal to allow non-intervening but interested parties to fully participate in the Carbon Plan process.**

We salute the Commission's commitment making this highly technical process as open to the public as possible and thank them for the remote and in person public hearings they have ordered to date. To ensure the substantive participation of the citizens across the state it is essential that the many interested stakeholders who are not intervening parties have access to all non-confidential data shared on April 15th. To date the utility has committed only to sharing the draft inputs with intervenors who sign non-disclosure agreements. We submit that such a restriction is unnecessary and counter to the Commission's intent that the Carbon Plan process be broadly inclusive of public input.

Duke committed in its April 5th filing to sharing its Encompass data set contemporaneously with the submission of the Carbon Plan on May 16th. To the extent there is non-confidential information within the Encompass data set shared at that time, we also request that it be made available with via a data room or other public-facing portal, so the many non-intervening stakeholders in the Carbon Plan process are able to participate as fully as possible in this historic process. As Commissioner Clodfelter indicated in his comments at the April 4th staff conference, protection of confidential information must not make public proceedings a "black box" to the vast majority of the public. We thank the Commission for their close attention to ensuring that the veil of confidentiality is applied only where truly necessary.

- 2. The Commission should require Duke/GPI to post stakeholder input to Duke's public website for the Carbon Plan, including email that is sent to the GPI Carbon Plan email.**

At present, Duke Energy and the Great Plains institute are not sharing all emails submitted to the dukecarbonplan@gpisd.net email address given to stakeholders to provide input. We request that the Commission order these emails to be anonymized on Duke Energy's Carbon Plan website so that interested parties can know whether their emails have been received and for the Commission and other stakeholders to have complete transparency as to the full range of stakeholder concerns.

3. Request that Commission order Duke to publicly report out on its plans for environmental justice and fossil fuel facility community engagement.

In the third and Final Carbon Plan stakeholder meeting Duke Energy indicated that it would be holding an additional stakeholder meeting related to environmental justice and the potentially overlapping topic of community impacts of coal plant closures. We request that the Commission order Duke to share publicly what “discrete” set of stakeholders Duke plans to invite and the agenda for this meeting so that all potentially impacted stakeholders understand the purpose and scope of this proposed meeting. Understanding that some conversations are best had in small groups, we urge that a model similar to the Technical Group meetings could be used, whereby certain experts are able to serve as primary presenters but a larger group is able to listen, comment and question.

Respectfully,

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