



February 16, 2021

Mrs. Kimberley A Campbell, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building, Fifth Floor  
430 North Salisbury Street  
Raleigh, North Carolina 27602

**RE: Duke Energy Progress' and Duke Energy Carolina' jointly submitted 2020 Biennial Integrated Resource Plan, Docket No. E-100, Sub 165**

Dear Chair Mitchell and Commission Members:

The City of Raleigh respectfully submits the following comments on the Duke Energy Progress and Duke Energy Carolina 2020 Biennial Integrated Resource Plan (IRP) filed on September 3rd, 2020. The City of Raleigh is among the largest Duke Energy customers and on behalf of our residents and our community as a whole, we represent more than 450,000 North Carolina residents. Accelerating a transition to a clean energy economy is a priority for our community; and we have a vision of a reliable, affordable, resilient, and equitable energy system. The IRP has a direct impact on the ability of the City to implement our goals and meet community needs and values. As the Utilities Commission evaluates the IRP, we would encourage the consideration of how the IRP can best align with Raleigh's goals and community priorities.

In 2019, Raleigh's City Council adopted a community greenhouse gas emissions (GHG) reduction goal of 80% by 2050. Community-wide, stationary energy makes up 55% of greenhouse gas emissions in Raleigh. A transition to clean, renewable energy and the greening of our electricity grid is the single most effective strategy contributing to our achievement of this goal. Raleigh's Community Climate Action Plan (CCAP) will work to reduce GHG emissions to meet this goal, while also working to adapt to climate change through resilience principles and by addressing equity and environmental justice. The topics being evaluated in the IRP can have a direct impact on our ability as a community to implement strategies to meet the priorities of the CCAP.

In addition, the City of Raleigh has established several policies and actions in our 2030 Comprehensive Plan and our five-year Strategic Plan that directly relate to the evaluation of the IRP. The 2030 Comprehensive Plan focuses on topics related to climate, environment, environmental justice, resilience, alternative and renewable energy and regional energy planning. The Strategic Plan

focuses on topics related to renewable energy, modernization of the grid, climate impacts, equity and environmental justice, resilience, and transportation electrification.

The City of Raleigh has established the following policies and actions in our 2030 Comprehensive Plan:

*Policy Environmental Protection 1.1 Greenhouse Gas Reduction*

Promote best practices for reducing greenhouse gas emissions as documented through the U.S. Mayors' Climate Protection Agreement.

*Policy Environmental Protection 1.10 Alternative Energy Sources*

Support the development and application of alternative energy sources, renewable energy technologies, and energy storage. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality.

*Policy Environmental Protection 1.11 Renewable Energy*

By 2030, increase the use of renewable energy to meet 20 percent of Raleigh's peak electric load, or maximum electric demand that is typically reached during normal business hours. This target will be reevaluated as additional research and information becomes available.

*Action Environmental Protection 1.8 Solar and Distributed Energy Resource Incentives*

Study and consider incentives to encourage home builders and residents to install solar and other distributed energy resource technologies, such as solar photovoltaics, solar thermal, geothermal heating and cooling and energy storage facilities.

*Action Environmental Protection 1.14 Renewable Energy Deployment*

Evaluate siting renewable energy facilities on city-owned property, including rooftops. Consider pairing renewable energy generation with on-site energy storage to improve reliability. Where feasible, emphasize exposure to the public through signage and other information to promote awareness of the benefits of renewable energy.

*Action Environmental Protection 1.19 Solar Access*

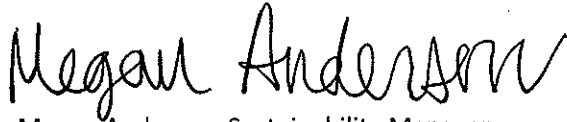
Evaluate the feasibility of adding considerations to building site-plan review and approval that address the current and future use of solar energy (i.e. solar easements, landscaping, building height restriction, and orientation).

*Policy Regional and Interjurisdictional Coordination 7.3 Regional Energy Planning*

Support regional efforts (such as the Research Triangle Energy Consortium) to improve energy efficiency, reduce the environmental impact of energy production, and improve energy security.

Duke Energy has and will continue to be an essential partner for the City of Raleigh in implementing and supporting the actions, policies, objectives, and initiatives above. The IRP appears to begin taking steps towards Duke Energy's goal of net-zero carbon by 2050. However, the City of Raleigh urges the Utilities Commission to hold Duke Energy accountable in early and aggressive actions in the integrated resource planning process that will make the net-zero goal viable: more aggressive investments in renewables, energy storage, and energy efficiency measures; and less reliance on fossil fuels can be effective in reducing carbon emissions and further aligning with the goals and priorities of our community.

Thank you for your courtesy and attention. We appreciate the opportunity to submit this comment and for your consideration of the City of Raleigh's community priorities.



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