

North Carolina Utilities Commission

Docket No. E-100, Sub 165

Attachment 5

**Exhibit TF-4 of Mr. Fitch's Direct Testimony, as submitted to the South Carolina
Public Service Commission (Dockets 2019-224-E and 2019-225-E)**

**Duke Energy Carolinas and Duke Energy Progress Response to Vote Solar Data
Request 2-10**

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DUKE ENERGY CAROLINAS, LLC AND DUKE ENERGY PROGRESS, LLC

Request:

Please refer to the IRP Report at page 131, which states “The Company also released the Duke Energy 2020 Climate Report in April 2020, which offered insights into the complexities and opportunities ahead and provided an enterprise-level scenario analysis with an illustrative path to net-zero.”

- a) Has the Company conducted an assessment of climate risk on the assets, operations, and earnings of Duke Energy Carolinas and/or Duke Energy Progress specifically?
- b) Provide any analyses conducted, commissioned, or consulted by the Company that seek to assess the incidence of climate risk on Duke Energy, Duke Energy Carolinas, and Duke Energy Progress’s climate risk to assets, operations, and earnings?
- c) Has the Company conducted an assessment of climate risk on ratepayers served by Duke Energy Carolinas and/or Duke Energy Progress specifically?
- d) How has the Company integrated climate-related physical risks as described in the Duke Energy 2020 Climate Report into its Integrated Resource Plan? These include but are not limited to increased incidence of flooding, increased incidence of extreme precipitation, and increased incidence of heat waves.
- e) Has the Company assessed the risk of stranded assets as contemplated on page 17 of the Duke Energy 2020 Climate Report?
- f) Has the Company assessed the risk of increased property insurance premiums as contemplated in the Duke Energy 2020 Climate Report?
- g) The 2020 Climate Report model assumes that gas “all natural gas combined-cycle units built in the 2020s are assumed to have a 20-year book life. Beyond 2030, all natural gas additions are assumed to be combustion turbines (“peakers”) only.” Does this IRP apply those same assumptions to future resource decisions? If not, why not?

Response:

- a) DEC and DEP object to this request because the Duke Energy 2020 Climate Report was not used in any way in the development of the 2020 IRPs, and therefore the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence in this IRP proceeding.
- b) DEC and DEP have not conducted any such analyses.

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c) DEC and DEP have not conducted any such analyses.

d) DEC and DEP object to this request because the Duke Energy 2020 Climate Report was not used in any way in the development of the 2020 IRPs, and therefore the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence in this IRP proceeding.

e) DEC and DEP object to this request because the Duke Energy 2020 Climate Report was not used in any way in the development of the 2020 IRPs, and therefore the request seeks information that is not relevant and not likely to lead to the discovery of admissible evidence in this IRP proceeding. DEC and DEP further object to this request to the extent that it seeks information that is protected by the attorney/client privilege and/or attorney work-product doctrine.

f) DEC and DEP have not conducted any such analyses.

g) This IRP does not apply those same assumptions for the future resource. The Climate Report studied one pathway to achieving Net Zero. There are several options with decisions relating generating technology, resource cost recovery, impact to customers, and numerous others. The assumptions and restrictions on gas resources in the IRP reflect multiple other options for portfolios that do not include limited gas resources past 2030 or exploring alternative resource cost recovery strategies as presented in the Climate Report.

Person Responsible: Jennifer Canipe, P.E., Lead Engineer, Resource Planning & Analytics – Carolinas

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