

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 147

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
2016 Integrated Resource Plans and)	NC WARN'S SECOND
Related 2016 REPS Compliance Plans)	STATEMENT OF POSITION

NOW COMES NC WARN, Inc. through the undersigned attorney, with its statements regarding Integrated Resources Plans ("IRPs"). The purpose for NC WARN's statements is to assist the Commission and the Public Staff in their reviews of the IRPs.

Duke Energy progressively relies on fossil fuel plants without first seeking opportunities to use energy storage or other renewable energy sources to meet its needs. NC WARN requests the Commission to reject any IRP that proposes new fossil fuel plants, new pipelines, or any new nuclear plants due to excessive cost and unsuccessful attempts for implementation, which cost ratepayers millions of dollars. NC WARN instead respectfully asks the Commission to consider Arizona Corporation Commission's ("ACC") recent order against the state investor-owned utilities, Arizona Public Service, Tucson Electric Power, and UNS Electric IRPs which sought new natural gas infrastructures.¹ ACC placed a temporary moratorium, denying requests for new gas plants 150 MW or larger. The ACC order-requires utilities to consider energy storage and renewable energy first before considering any new natural gas infrastructure. ACC's

¹ See <http://images.edocket.azcc.gov/docketpdf/0000186964.pdf>

Commissioner Andy Tobin also proposes a plan which calls for 80% clean energy by 2050.²

Critics will argue that energy storage is not a reliable alternative compared to fossil fuel sources, however studies will show different. As a matter of fact, energy storage is very reliable. Not only is energy storage a cheaper alternative, Austin Energy provides an expected forced outage rate for battery storage of 0-3.5%.³ Also, according to California Energy Commission, Estimated Cost of New Renewable and Fossil Generation in California, combined cycle forced outage rate of 2.24%.⁴

Other states are moving forward with more renewable energy and are not only retiring coal power plants, but also seeking to retire natural gas plants as well. North Carolina should take the initiative and plan to reduce power generated by coal and natural gas fired plants 57% by 2025. Furthermore, North Carolina should reduce greenhouse gas emissions from electricity generation by 100% by 2030, using gas plants only for backup supply.⁵ Pursuing energy storage, efficiency and more renewables could save customers millions.

² Arizona's Energy Modernization Plan Proposed by ACC Commissioner Andy Tobin, <http://www.azcc.gov/commissioners/atobin/letters/energyplan.asp>

³ 2016 Austin Energy summary of its proposed energy storage procurement: <http://www.austintexas.gov/edims/document.cfm?id=263188>. Pg. 5

⁴ March 2015, California Energy Commission, Estimated Cost of New Renewable and Fossil Generation in California, p. 248 (p.D-7) <http://www.energy.ca.gov/2014publications/CEC-200-2014-003/CEC-200-2014-003-SF.pdf>.

⁵ NC Clean Path 2025. See www.ncwarn.org/wp-content/uploads/NC-CLEAN-PATH-2025-FINAL-8-9-17.pdf

Respectfully submitted, this 3rd day of April 2018.

/s/ Kristen L. Wills

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Apr 03 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing STATEMENT OF POSITION (E-100, Sub 147) 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 3rd day of April 2018.

/s/ Kristen L. Wills
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