

February 28, 2020

Ms. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Re: Testimony Regarding 2019 IRP Update Reports and Related 2019
REPS Compliance Plans, Docket E-100 Sub 157

Dear Ms. Jarvis:

On behalf of my wife and me, we herewith submit, via electronic filing with the Commission, our testimony regarding the 2019 IRP Update Reports and Related 2019 REPS Compliance Plans, Docket E-100 Sub 157.

If you should have any questions concerning this filing, please let me know.

Thank you.

Sincerely,

/s/ Patrick Flynn

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET E-100 SUB 157

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

2019 Integrated Resource Plan Update) NOTICE OF PUBLIC HEARING ON
Reports and Related 2019 REPS) 2019 IRP UPDATE REPORTS AND
Compliance Plans) RELATED 2019 REPS COMPLIANCE
) PLANS

Pursuant to North Carolina Utilities Commission ("Commission") Rule R1-21(g), Patrick and Belinda Flynn ("The Flynn's" or "Petitioners"), requests the Commission for this testimony to be read into the record and be additionally considered by the Public Staff to update their comments in this proceeding.

In support of this testimony, Patrick and Belinda Flynn state the following:

- 1. The name and mailing address of the Petitioners is:

Patrick and Belinda Flynn
PO Box 1004
Edenton, NC 27032

- 2. The Petitioners are not represented by attorney at the time of this filing and own a building whose power is serviced by The Town of Edenton and connected to the Grid via Duke Energy Progress, Duke Energy Carolinas and/or

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (Utility Providers).

3. The Flynnns are individuals who have an interest in promoting the fairness and equality of utility rates in North Carolina and will bring critical insight, knowledge, and understanding to this proceeding and the specific issues that will be raised in this proceeding:

This hearing will evaluate power generation estimates by said Utility Providers, and to specifically evaluate power provided from small power producers.

4. Said Utility Providers will manage accounting and usage numbers for their customers. Their profit comes from a percentage of the income from energy sold, bringing that electricity to customers from power plants, and solar and wind providers. The cost of creating electricity from these sources is borne by Utility Provider customers. Unfortunately, reliance on solar or wind providers dramatically increases the future cost these customers will bear.

It's likely energy projection costs don't reflect the state and federal tax credits wind and solar energy providers receive for constructing their facilities. Additionally, a recent Avoided Rate increase of \$30 million was approved by the NC Utility Commission to offset new transmission infrastructure and new power plant construction costs estimated to be \$1.84 billion for one Utility Provider example of Dominion Energy's near term clean energy projects, to be absorbed by its 220,000 NC customers. This is unfair. These Utility Provider investment costs won't be the responsibility of these corporate entities but, instead, will come from their customers.

Liability to my wife and I, as well as other Chowan County citizens because of the Utility Providers' local management and operations, will unfairly include many years of future customer rate increases and avoided rate cost increases. The

burden of investment to increase anticipated power usage should not come at the expense of any utility customer. Increasing planned energy sources should be considered a normal cost of doing business and taken from Dominion Energy's \$800 million in its 2016 profits, as one Utility Provider suggestion. Future increases and costs for green energy should be applied to the Utility Provider's bottom line expenses for several reasons:

5. New wind and solar project energy development will cause NC utility rates to rise to the tune of \$1.8 billion for one Utility Provider. That much is clear from existing turbine projects across the country. Two hundred and twenty-two thousand (220,000) NC citizens will be liable for and bear the entire project costs via future utility bill increases, even though there was no approval process protecting their due process.

Approval authority for new wind and solar projects is limited to the county or town it resides. The burden of future electric supply development, construction, operational costing and decommissioning costs is not shared fairly in Dominion Energy's case. Unfortunately, those costs will be passed on to all utility customers in every county that Utility Provider serves. Utility citizens bear the entire burden for the new projects with no apparent benefit except rising utility rates for the life of each green energy project. This is grossly unfair and violates the spirit of PURPA fairness.

6. Utility Provider wind and solar projects are commercial ventures. Any costs associated with the development, construction and operations of the wind and solar energy project should be carried by the developer/owner for the entire life of the project, including decommissioning. In one example, Dominion Energy's rate increase application outlines \$1.3B for a generating station, \$132M for a solar facility and \$410M for 2 new solar facilities. These figures don't include \$268M in

existing improvements and another \$200M in proposed improvement investments. This is money Dominion corporate, wind developers and solar developers won't have to spend to make energy projects a reality.

So, Dominion seeks the first installment on its above mentioned projects at an investment total of \$1.84B. At a rate increase of \$30M per year with all things the same it will take over 60 rate hearings to make up the investment costs listed in their current rate hearing paperwork. With one every two years that's 120+ years to see any money equilibrium if we project Dominion's current numbers out, with Dominion not expanding its business model with any new projects over the next 120 years. Completely unfair to NC utility customers.

The above statements explain how the due process financial rights of my wife, me and many NC utility citizens will be violated with increased wind and solar rates. I motion the NC Utility Commission that wind or solar energy rate payments or increases not be applied to any future consumer bill because of Utility Providers until Utility Providers bear initial development and construction costs.

WHEREFORE, for the foregoing reasons, Patrick and Belinda Flynn respectfully request that the Commission not substitute customer rate increases for what should be corporate investments.

Respectfully submitted this ____ day of February, 2019.

BY: /s/ Patrick Flynn