

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 157

In the Matter of)	
2018 Biennial Integrated Resource Plans)	<u>MOTION FOR EVIDENTIARY</u>
and Related 2018 REPS Compliance)	<u>HEARING</u>
Plans)	

NOW COMES NC WARN Inc. (“NC WARN”), by and through undersigned counsel, pursuant to North Carolina Utilities Commission (“Commission”) Rule R8-60(k), and moves the Commission to hold an evidentiary hearing in the above-mentioned docket on the issues stated in paragraph 8 below. In support of this motion, NC WARN shows as follows:

1. Commission Rule R8-60 requires that Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies” or “Duke Energy”) provide to the Commission a biennial Integrated Resource Plan (“IRP”) report in even-numbered years. The biennial report must contain the detailed information described in Commission Rule R8-60(i). In odd-numbered years, the Companies provide an annual report which updates the Companies’ most recent biennial report.

2. This being an even-numbered year, the Companies filed their biennial IRP reports on September 5, 2018. NC WARN’s Petition to Intervene in this docket was granted by the Commission on July 12, 2018.

3. The Commission has the discretion to convene an evidentiary hearing during any biennial IRP docket. Pursuant to Commission Rule R8-60(k), “[t]he Public

Staff or any intervenor may identify any issue that it believes should be the subject of an evidentiary hearing. . . . A hearing to address issues raised by the Public Staff or other intervenors may be scheduled at the discretion of the Commission.”

4. Evidentiary hearings on IRP reports used to be commonplace. For example, an evidentiary hearing was held during the 2005 IRP proceeding (Docket No. E-100, Sub 103) and the 2007 IRP proceeding (Docket No. E-100, Sub 114). Upon information and belief, no evidentiary hearing has been held since the 2007 IRP proceeding.

5. This year, the need for an evidentiary hearing on the Companies’ IRP reports is greater than ever. As this Commission is aware, the Intergovernmental Panel on Climate Change (“IPCC”), which is a committee established by the United Nations, issued a report on October 8, 2018. That report concluded that, if greenhouse gas emissions continue at the present rate, the atmosphere will warm by approximately 2.7 degrees Fahrenheit above preindustrial levels by 2040. Such warming would ruin coastlines, intensify droughts, and cause other damages. To prevent the disastrous consequences of climate change, the IPCC concluded that greenhouse pollution must be reduced by forty-five percent (45%) from 2010 levels by 2030, and one-hundred percent (100%) by 2050. Furthermore, the IPCC concluded that the use of coal as an electricity source must decrease to between one and seven percent (1%-7%) by 2050. Hence, the IPCC recommended that renewable energy such as solar and wind should increase to as much as sixty-seven percent (67%) by 2050. (A full copy of the IPCC report is available at <http://www.ipcc.ch/report/sr15/>.)

6. Therefore, the Companies' resource management will have both immediate and long-term impacts upon the environment. Any proceeding before the Commission must take account of these environmental issues. N.C. Gen. Stat. § 62-2(a)(5) (the Public Utilities Act states that, "It is hereby declared to be the policy of the State of North Carolina: . . . To encourage and promote harmony between public utilities, their users and the environment . . .").

7. NC WARN plans to submit evidence in this docket that, in addition to promoting environmental health, renewable energy supported by battery storage is more cost-effective and reliable than gas-fired electricity generation and, therefore, additional resources of the Companies should be dedicated to renewables and battery storage. While many other utilities, and state and local governments, are already transitioning to renewables co-located with storage, Duke Energy seems locked in the 20th Century as it proposes to add nearly 10,000 MW of generation from fracked gas – a leading contributor to climate change in the critical short term – while treating battery storage as appropriate only for pilot scale projects.

8. All of the following issues bear upon whether the Companies' IRP reports are adequate to protect the environment yet simultaneously achieve a least cost integrated resource planning:

- a. The validity of the Companies' load forecasting;
- b. The validity of the Companies' reserve margin;
- c. The potential opportunities for cost-effective energy efficiency and conservation measures;
- d. The potential opportunities for cost-effective renewable energy, including but not limited to battery storage, solar, and wind;

- e. The degree to which utility programs can effectively reduce consumption; and,
 - f. The validity and appropriateness of the Companies' projected energy mix over the planning horizon.
9. Given the fact that it has been many years since an evidentiary hearing has been held on the Companies' IRP reports; given the urgency of the climate crisis; and given the central role that the Companies' resource planning plays upon the climate crisis, NC WARN respectfully requests that the Commission convene an evidentiary hearing in this docket on the issues stated in the immediately preceding paragraph.

WHEREFORE, for the reasons set forth above, NC WARN respectfully moves the Commission to schedule an evidentiary hearing in the above-mentioned docket on the issues stated in paragraph 8 of this motion.

Respectfully submitted, this the 8th day of November, 2018.

Kristen Wills / *By permission MR*

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion for Evidentiary Hearing has been duly served upon all persons on the Commission's docket service list by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery.

This the 8th day of November, 2018.


Matthew D. Quinn