



# AppalachianVoices

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June 15, 2018

Ms. Martha Lynn Jarvis, Chief Clerk  
North Carolina Utilities Commission  
430 North Salisbury Street  
Dobbs Building  
Raleigh, NC 27603-5918  
*Sent electronically to: statements@ncuc.net*

Re: Duke Energy Carolinas, LLC Proposed Grid Rider Settlement (Docket No. E-7, Sub 1146)

Dear Ms. Jarvis,

We write today in opposition to the proposed partial settlement between Duke Energy Carolinas ("DEC"), the Environmental Defense Fund, the North Carolina Sustainable Energy Association, and the Sierra Club (the "Grid Rider Settlement").

The nature of the proposed settlement, combined with the way it was reached, short-circuits the necessary checks and balances designed to ensure that monopoly utilities act in the public interest, not merely the interest of their shareholders and business models.

The proposed settlement would be harmful to ratepayers and have a disproportionate impact on low-income residential ratepayers. Based on evidence presented by DEC itself, those customers would pay the majority of the costs of grid modernization and would benefit the least from these investments.

As independent analysis has shown, under the Grid Rider Settlement residential customers would experience a 6.1% rate increase by the third year of the rider, and that is in addition to any rate increase approved by the Commission resulting from DEC's other requests for cost recovery.

Moreover, this proposed settlement was reached in closed-door meetings, without any ability for cross examination or external analysis of the program being proposed. Grid modernization should be considered during a normal ratemaking proceeding, where interested stakeholders have an opportunity to intervene, not as a single-issue rider as is being attempted here.

It is the duty of the Commission to rule based on what is prudent and in the public interest. The proposed Grid Rider Settlement is neither, and the Commission should not rely on the stipulation of third parties to determine what conforms to these requirements. Appalachian Voices adds our support to the existing network of stakeholders standing in opposition to the proposed settlement.

Sincerely,

Tom Cormons  
Executive Director  
Appalachian Voices

Rory McIlmoil  
Energy Savings Program Manager  
Appalachian Voices

