2026 North Carolina CPIRP Local Government Joint Letter Summary

Below is a summary of key recommendations for the NCUC, which are further elaborated throughout the letter. The organizing requests are:

- **Call for greater transparency and explanation of Duke Energy's economic development load forecasting methodology**. Duke Energy's methodology for projecting new load drives major investment decisions and long-term rate impacts. Clearer assumptions and documentation will help stakeholders evaluate system needs and protect customers from unnecessary costs.

- **Require Duke Energy to plan for an affordable, reliable, and resilient energy system by optimizing the existing grid and investing in cost-effective, least-risk electricity generation resources.** Fossil fuel generation exposes customers to unpredictable fuel costs, while renewable resources have no fuel costs and provide long-term price stability. Strengthening the existing grid and competitively acquiring resources through all-source procurement will reduce reliance on more costly new generation and limit exposure to volatile fuel markets, supporting a least-risk system and helping maintain affordability for residents, businesses, and local governments.

- **Encourage Duke Energy to create viable, cost-effective clean energy procurement pathways for large customers.** The resource mix proposed in the CPIRP will not enable local governments to meet their near-term clean energy and climate targets, underscoring the need for alternative procurement pathways. The current Green Source Advantage (GSA) and GSA Choice structures remain too complex, restrictive, and costly, suppressing customer uptake and underscoring the need for accessible, affordable programs to fill the near-term gap.

- **Direct Duke Energy to fully value energy efficiency and demand-side resources in planning.** These resources reduce peak demand, defer costly infrastructure, and enhance resilience at a lower cost than new generation. Treating them as selectable planning resources will improve system affordability and reliability.

- **Protect existing ratepayers from disproportionate cost burdens associated with new large loads.** Rapid growth should not result in higher bills for residents, small businesses, or public agencies already struggling with rising energy costs. Fair cost allocation—consistent with models used in other states—will help maintain affordability as the grid expands.