

Duke Energy Indiana's 2021 Integrated Resource Plan
Indiana State Conference of the NAACP Comment

I. Introduction

Upon reviewing Duke Energy Indiana's 2021 Integrated Resource Plan (IRP), the Indiana State Conference of the NAACP (NAACP) has prepared the following comments and recommendations. Within Duke Energy Indiana's IRP, they have stated that this IRP is not a final document or decision, but merely provides a roadmap for the future. Considering this acknowledgement, the NAACP strongly encourages Duke to consider the following recommendations when implementing their IRP moving forward.

II. Renewable Energy Expansion that Benefits disadvantaged communities, Blacks and other Communities of Color

After reviewing several energy portfolio options, including stakeholder inspired portfolios that were environmentally focused and achieved 90-100% CO₂ reduction by 2035, Duke Energy Indiana opted for a preferred portfolio that continues to rely on a combination of coal, natural gas, and makes minimal progress toward increasing their renewable energy portfolio. Given this choice of a preferred portfolio, the NAACP highly recommends that Duke Energy Indiana choose a portfolio that takes a more aggressive approach to expanding renewable energy opportunities and one that specifically benefits disadvantaged communities, Blacks and other communities of color.

According to Duke Energy Indiana's IRP, 84% of Duke Energy Indiana's total energy is generated from burning or gasifying coal. Studies have shown that disadvantaged communities, Blacks and other communities of color are disproportionately exposed to the harmful air pollutants that result from burning fossil fuels, such as coal. While Duke Energy Indiana is working towards retiring coal by 2035, until then, the physical health of disadvantaged communities, Blacks and other communities of color will continue to suffer.

If Duke Energy Indiana insists on relying on coal to power Indiana for the foreseeable future, the NAACP recommends that Duke Energy begin to remedy the harms done to disadvantaged communities and Blacks and other communities of color by supporting and providing resources for community-designed solar projects in these communities. Investing in equitable community owned solar facilities will not only allow African American and Black, Indigenous, and People of Color (BIPOC) to realize the environmental and health benefits that solar energy provides but can also help alleviate the energy burden (higher percentage of energy costs compared to gross income) that African American and BIPOC communities disproportionately face.

In addition to investing in community solar facilities in disadvantaged communities, Blacks and other communities of color, the NAACP would strongly encourage Duke Energy Indiana to go one step further by giving these communities ownership in community solar facilities and give them the opportunity to share in the economic benefits, such as dividends or a share of the net

operating cash, that are always reserved for Duke Energy Indiana's shareholders. With these economic benefits, disadvantaged communities and Blacks and other communities of color would have the power to identify their own community needs and make direct investments in their communities.

III. Workforce Opportunities that Center African American and BIPOC Communities

As Duke Energy Indiana looks to build out their renewable energy portfolio, albeit minimal, and the electric vehicle charging stations, this could mean an increase in job and training opportunities with a fair chance in various fields, such as buildings, construction, engineering, architecture, maintenance, and operations. With this expansion in job opportunities, the NAACP recommends that Duke Energy Indiana prioritize contracting with Black/minority-owned businesses and setting local hiring and procurement standards to ensure that African American and BIPOC communities are benefiting from this expansion in workforce opportunities. In addition, electric vehicle charging stations placement in opportunity zones/diverse communities can be revenue generating to Black/minority owned businesses, nonprofits and public schools.

IV. Justice40 Compliance

Within the first week of taking Office, President Biden signed Executive Order 14008—Tackling the Climate Crisis at Home and Abroad. And, within that Executive Order, the Biden-Harris Administration made a commitment to ensuring that at least 40% of overall benefits of certain federal investments, including investments in clean energy and energy efficiency, flow toward disadvantaged communities.

Since signing this Executive Order, Congress has passed the Infrastructure Investment and Jobs Act (IIJA), also known as the Bipartisan Infrastructure Law. Passage of this legislation has guaranteed historical investments in our Nation's infrastructure, including \$10 Billion dedicated to upgrading and enhancing the reliability and resiliency of our electrical grid.

Given entities, such as Duke Energy Indiana, will be eligible to receive these Federal investments, the NAACP strongly recommends that Duke Energy Indiana comply with the Justice40 initiative and collaborate with disadvantaged communities when choosing where to focus any federal funding. To ensure 40% of benefits are reaching disadvantaged communities, the NAACP would be happy to convene a table with Duke Energy Indiana to identify the communities within Indiana that would be deeply impacted by these targeted federal investments.

V. Conclusion

The NAACP appreciates this opportunity to provide public comment on the Duke Energy Indiana 2021 IRP and would welcome the opportunity to have further discussions on our comments and recommendations.

Sincerely,

[Barbara Bolling Williams](#)

Barbara Bolling-Williams, esq

President

Indiana State Conference of the NAACP

[Denise Abdul-Rahman](#)

Denise Abdul-Rahman

State Chair Environmental & Climate Justice

Indiana State Conference of the NAACP