



**BUILDING PEOPLE POWER  
FOR ENERGY & CLIMATE JUSTICE**

---

November 27, 2019

Michael Regan, Secretary  
NC Department of Environmental Quality  
217 West Jones Street  
Raleigh, NC 27603

Dear Secretary Regan:

I write in support of the petition filed August 13, 2019 by the North Carolina Climate Solutions Coalition and Friends of the Earth to revoke the water quality permit that DEQ issued in 2018 to the developers of the Atlantic Coast Pipeline (ACP) under Section 401 of the Clean Water Act.

NC WARN agrees that Duke Energy and Dominion Resources cut corners so much in planning the ACP that the state water permit should be withdrawn. In addition, we agree with the petitioners that conditions have changed significantly enough since the granting of the permit that a revocation and reassessment are justified.

The ACP is a major part of Duke Energy's massive planned buildout of natural gas infrastructure, which threatens to be a climate and economic disaster.

First, methane emissions from natural gas operations are understood now more than ever to be a primary contributor to the recent increase in atmospheric methane. And cutting methane emissions is understood to be essential to quickly get greenhouse gas emissions under control ([biogeosciences.net/16/3033/2019/](http://biogeosciences.net/16/3033/2019/)).

In addition, the pipeline developers have made false claims that the ACP will spur economic development, whereas our June 2019 analysis, provided to Governor Cooper ([bit.ly/2XBw5Sj](http://bit.ly/2XBw5Sj)), shows that Duke and Dominion never planned to make gas available for industry along the eight-county route. The gas is intended for Duke's power plants, with no delivery points for new industry. The same analysis shows that, if ever completed, the stalled pipeline would cost North Carolinians over \$20 billion due to ongoing cost overruns.

Finally, recent research, including a report from the Rocky Mountain Institute ([rmi.org/insight/breakthrough-batteries/](http://rmi.org/insight/breakthrough-batteries/)), shows that new gas infrastructure is more

expensive than solar combined with battery storage and will be a stranded asset well before the end of its useful life.

In short, conditions have changed and more information has come to light since DEQ issued the Section 401 permit to the ACP. We therefore respectfully request that you grant the aforementioned petition and revoke the permit.

Sincerely,

A handwritten signature in blue ink that reads "Jim Warren". The signature is written in a cursive, flowing style.

Jim Warren  
Executive Director

cc:

Governor Roy Cooper  
Attorney General Josh Stein