

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 167

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In the Matter of
Biennial Determination of Avoided Cost
Rates for Electric Utility Purchases from
Qualifying Facilities – 2020

PETITION TO INTERVENE OF THE
CAROLINA INDUSTRIAL GROUP FOR
FAIR UTILITY RATES I, II, and III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (“CIGFUR I”), Carolina Industrial Group for Fair Utility Rates II (“CIGFUR II”), and Carolina Industrial Group for Fair Utility Rates III (“CIGFUR III”) (collectively, “CIGFUR”), pursuant to Commission Rules R1-5, R1-7, and R1-19 and the Commission’s August 13, 2020 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing*, and file this petition to intervene and, in support of this petition, show as follows:

1. CIGFUR I is an association of purchasers of electric power from Dominion Energy North Carolina (“DENC”). CIGFUR I’s address is Post Office Box 1351, Raleigh, North Carolina, 27602-1351. CIGFUR I may be contacted by email through its counsel at cress@bdixon.com.
2. CIGFUR II is an association of purchasers of electric power from Duke Energy Progress, LLC (“DEP”). CIGFUR II’s address is Post Office Box 13 51, Raleigh, North Carolina, 27602-1351. CIGFUR II may be contacted by email through its counsel at cress@bdixon.com.
3. CIGFUR III is an association of purchasers of electric power from Duke Energy Carolinas, LLC (“DEC”). CIGFUR III’s address is Post Office Box 1351, Raleigh, North Carolina, 27602-13 51. CIGFUR III may be contacted by email through its counsel at cress@bdixon.com.

4. As purchasers of electric power from DENC, the members of CIGFUR I have direct, substantial, and pecuniary interests in this proceeding.
5. As purchasers of electric power from DEP, the members of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding.
6. As purchasers of electric power from DEC, the members of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding.
7. CIGFUR's participation in this docket will bring the important perspective of high load factor ratepayers of DENC, DEP, and DEC, respectively.
8. CIGFUR has frequently appeared before this Commission as an intervenor and CIGFUR's interest in avoided cost dockets has consistently been recognized by the Commission. *See, e.g.*, Docket No. E-100, Sub 148; Docket No. E-100, Sub 140; Docket No. E-100, Sub 136; and Docket No. E-100, Sub 127.
9. Pursuant to Commission Rule R1-39, CIGFUR consents to electronic service of all pleadings and other papers in this docket.

WHEREFORE, CIGFUR respectfully requests to be allowed to intervene in the above-captioned docket.

Respectfully submitted, this the 22nd day of October, 2020.


CIGFUR I, II, and III

/s/ Christina D. Cress
Christina D. Cress
Bailey & Dixon, LLP
PO Box 1351
Raleigh, NC 27602
919-828-0731
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VERIFICATION

Christina Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR I, II, and III; that she has read the foregoing Petition to Intervene and that same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true, and that she is authorized to sign this verification on behalf of CIGFUR I, II, and III.

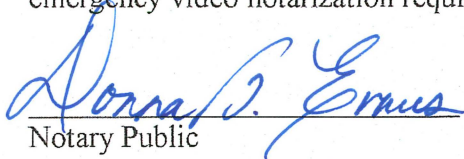
October 22, 2020

By: 
Christina Cress

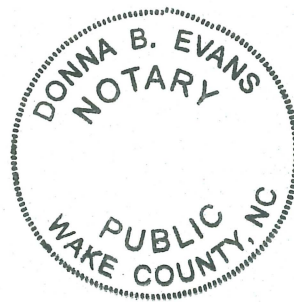
STATE OF NORTH CAROLINA

COUNTY OF WAKE

Sworn to and subscribed before me, via live videoconference, this the 22nd day of October, 2020. I signed this notarial certificate on the 22nd day of October, 2020, according to the emergency video notarization requirements set forth in G.S. § 10B-25.


Notary Public

DONNA B. EVANS
Typed or Printed Notary Name




My Commission Expires: 03-04-2023

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she caused the foregoing *Petition to Intervene of CIGFUR I, II, and III* upon the parties of record in this proceeding by electronic mail.

October 22, 2020.



Christina D. Cress
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