

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1170
DOCKET NO. E-7, SUB 1169

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Petition of Duke Energy Progress, LLC,)	NORTH CAROLINA ELECTRIC
and Duke Energy Carolinas, LLC,)	MEMBERSHIP CORPORATION'S
Requesting Approval of Green Source)	PETITION TO INTERVENE
Advantage Program and Rider GSA to)	
Implement G.S. 62-159.2)	

NOW COMES the North Carolina Electric Membership Corporation ("NCEMC") and, pursuant to North Carolina Utilities Commission ("Commission") Rules R1-7 and R1-19 and in accordance with the *Order Establishing Proceeding to Review Proposed Green Source Rider Advantage Program and Rider GSA* issued on January 26, 2018, files this Petition to Intervene.

Petition to Intervene

NCEMC requests that it be permitted to intervene and participate in the above-captioned proceedings and shows unto the Commission as follows:

1. NCEMC's attorneys, to whom all communications and pleadings should be addressed are:

Richard M. Feathers
Senior Vice President and General Counsel
North Carolina Electric Membership Corporation
Post Office Box 27306
Raleigh, NC 27611
Telephone: (919) 875-3121
Email: rick.feathers@ncemcs.com

Michael D. Youth
Government and Regulatory Affairs Counsel
Telephone: (919) 875-3060
Email: michael.youth@ncemcs.com

2. NCEMC is a generation and transmission cooperative responsible for the power supply of its 25 member distribution cooperatives throughout the State of North Carolina. NCEMC generates power and energy and purchases power and energy, pursuant to wholesale contracts, from Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and others to supply its members. These members, in turn, supply power to their members, the end-use retail consumers.
3. NCEMC was a stakeholder in the legislative process that led to enactment of N.C. Sess. Law 2017-192 (“H.B. 589”) and has already constructively participated in Commission rulemaking related to H.B. 589. *See, e.g.*, Commission Docket No. E-100, Sub 150.
4. NCEMC has a vital interest in the matters at issue in these proceedings and should be permitted to intervene and participate. To be more pointed, throughout the stakeholder process that led to the enactment of H.B. 589, NCEMC’s member EMCs sought recognition – by stakeholders, legislators, and others involved in the process – of the increasing system costs (and operational impacts) associated with renewables integration and the fact that these costs are being shouldered by all North Carolinians. NCEMC’s interest continues to be ensuring that proceedings implementing H.B. 589 comport with the legislature’s directives regarding cost restrictions including, in this docket, the instruction that: “The Commission shall ensure that all [non-participating] customers are held neutral, neither advantaged nor disadvantaged, from the

impact of the renewable electricity procured on behalf of the program customer.” N.C. Gen. Stat. § 62-159.2(e).

- 5. No other party can adequately represent NCEMC's interests in this proceeding.
- 6. NCEMC agrees to accept electronic service of all filings in the Docket.
- 7. NCEMC asks that the Commission make it a party to this proceeding and permit it to exercise all rights provided to intervenors under North Carolina law and this Commission’s rules.

WHEREFORE, NCEMC requests that its *Petition to Intervene* be granted.

Respectfully submitted this the 21st day of February, 2018.

**NORTH CAROLINA ELECTRIC
MEMBERSHIP CORPORATION**

By: 

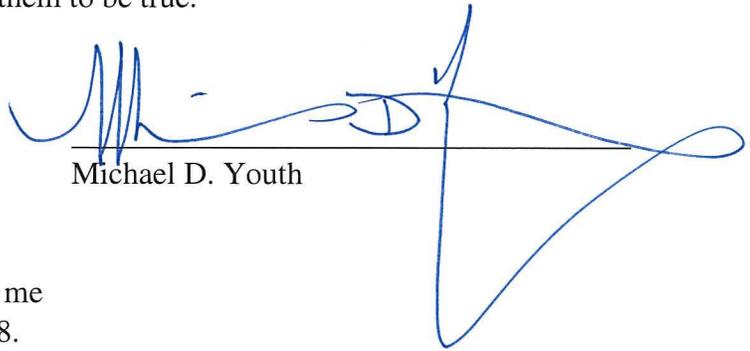
Michael D. Youth
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STATE OF NORTH CAROLINA

COUNTY OF WAKE

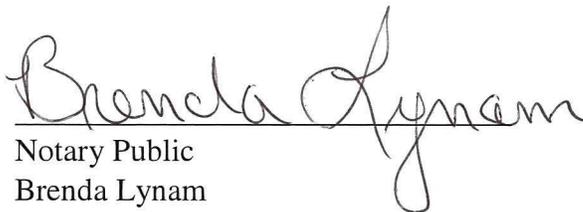
Michael D. Youth, having been first duly sworn, deposes and says:

1. He is Government and Regulatory Affairs Counsel for North Carolina Electric Membership Corporation.
2. He has read the foregoing Petition to Intervene and knows its contents.
3. The matters stated in this instrument are true of his knowledge, except as to those matters that are stated to be on information and belief, and, as to those matters, he believes them to be true.



Michael D. Youth

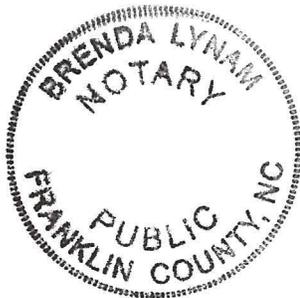
Sworn to and subscribed before me
This 21st day of February, 2018.



Notary Public
Brenda Lynam

My Commission Expires: 11/18/2018

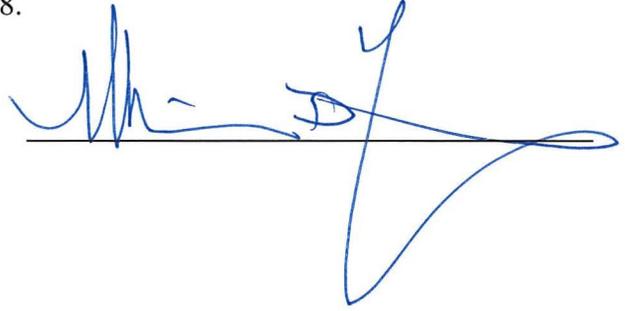
[SEAL]



CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document has been served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

This the 21st day of February 2018.

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be 'M. J. [unclear]'. The ink is a vibrant blue color.