

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1341
DOCKET NO. E-2, SUB 1342
DOCKET NO. E-2, SUB 1343
DOCKET NO. E-2, SUB 1344
DOCKET NO. E-2, SUB 1345

DOCKET NO. E-2, SUB 1341)

)
In the Matter of)
Application of Duke Energy Progress,)
LLC Pursuant to G.S. 62-133.2 and)
NCUC Rule R8-55 Relating to Fuel)
and Fuel-Related Charge Adjustments)
for Electric Utilities)

)
DOCKET NO. E-2, SUB 1342)

)
In the Matter of)
Application of Duke Energy Progress,)
LLC Pursuant to N.C. Gen. Stat. § 62-)
133.9 and Commission Rule R8-69 for)
Approval of Demand-Side)
Management and Energy Efficiency)
Cost Recovery Rider)

CUCA'S PETITION TO INTERVENE

)
DOCKET NO. E-2, SUB 1343)

)
In the Matter of)
Application of Duke Energy Progress,)
LLC Pursuant to N.C. Gen. Stat. § 62-)
133.8 and Commission Rule R8-67 for)
Approval of CEPS Compliance Report)
and CEPS Cost Recovery Rider)

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DOCKET NO. E-2, SUB 1344)

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In the Matter of)
Application of Duke Energy Progress,)
LLC Pursuant to G.S. 62-110.8 and)
Commission Rule R8-71 for Approval)
of CPRE Compliance Report and)
CPRE Cost Recovery Rider)

DOCKET NO. E-2, SUB 1345)
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 In the Matter of)
 Application of Duke Energy Progress,)
 LLC Pursuant to G.S. 62-133.2 and)
 Commission Rule R8-70 relating to)
 Joint Agency Asset Cost Recovery
 Rider

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-captioned dockets. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and address of its principal officer are:

Kevin N. Martin
 Executive Director
 Carolina Utility Customers Association, Inc.
 8386 Six Forks Rd, Suite 103
 Raleigh, NC 27615
 kmartin@cucainc.org

3. CUCA’s attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA’s Executive Director Kevin Martin:

Marcus W. Trathen
 Matthew B. Tynan
 Christopher B. Dodd
 BROOKS, PIERCE, MCLENDON,
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4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke Energy Progress, LLC (“DEP”) has been authorized by the Commission to sell electricity at retail.

5. CUCA’s member companies use electricity sold by DEP in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies.

6. The issues raised in the above-captioned dockets will affect the rates and availability of electricity to CUCA members. As ratepayers and purchasers of electric power from DEP, CUCA has a vital interest in the matters at issue in the above-captioned proceedings and should be permitted to intervene and participate.

7. No other party is capable of adequately representing CUCA’s interests in these proceedings.

8. Pursuant to Commission Rule R1-39, CUCA agrees to accept electronic service of all filings in these proceedings.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceedings, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

Respectfully submitted, this 28th day of June, 2024.



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*Attorneys for Carolina Utility Customers
Association, Inc.*

VERIFICATION


Christopher B. Dodd, first being duly sworn, deposes and says that he is the attorney for Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and thing therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Carolina Utility Customers Association, Inc..

This the 28th day of June, 2024.



Christopher B. Dodd

Sworn to and subscribed before me
this 28th day of June, 2024.



Notary Public

Commission Expires: 11/12/2026

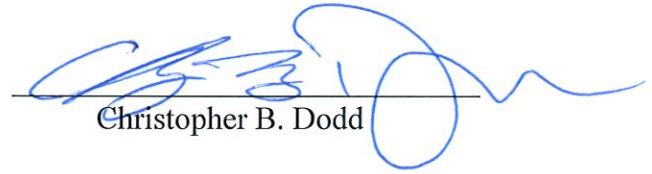


Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in these proceedings by electronic mail.

This the 28th day of June, 2024.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP



Christopher B. Dodd