

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 179

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:		
Duke Energy Progress, LLC, and Duke)	NC WARN'S PETITION
Energy Carolinas, LLC, 2022 Biennial)	TO INTERVENE
Integrated Resource Plans and Carbon Plan)	

Pursuant to the North Carolina Utilities Commission's ("NCUC" or "Commission") Rules R1-5, R1-7, and R1-19, NC WARN, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of this petition:

1. NC WARN is a not-for-profit corporation organized and existing under the laws of the State of North Carolina. NC WARN has approximately one thousand individual members across the State, and its mission is to reduce hazards to public health and the environment from nuclear power, carbon emissions and other forms of electricity production.

2. In furtherance of this mission, NC WARN actively works to promote the use of energy efficiency and renewable energy resources, including but not limited to rooftop solar. Furthermore, NC WARN is a frequent participant in NCUC dockets and stakeholder events involving Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, the "Companies").

3. Most of NC WARN's members reside in the State of North Carolina, and furthermore, many of NC WARN's members are the Companies' customers.

Moreover, all of NC WARN's participants will be impacted by the Companies' emissions of carbon.

4. For these reasons, among others, NC WARN's members have a direct vested interest in the relief sought by the Companies in the above-referenced docket. Moreover, the implications of the Companies' Carbon Plan proposal in this docket implicate NC WARN's core organizational mission and interests. Therefore, NC WARN and its members have a direct and substantial interest in this proceeding.

5. NC WARN has substantial experience in energy-related dockets before the NCUC, the Federal Energy Regulatory Commission, and other governmental bodies. Further, NC WARN has significant contacts with subject-matter experts having expertise in climate change, emissions, energy policy, utilities policy, and other related fields. NC WARN intends to use this experience and expertise to evaluate and provide feedback on the Companies' Carbon Plan in the above-captioned docket.

6. NC WARN's address is Post Office Box 61051, Durham, North Carolina, 27715-1051.

7. The attorney for NC WARN to whom all correspondence and filings in this docket can be addressed is Matthew D. Quinn, Lewis & Roberts, PLLC, 3700 Glenwood Ave., Ste. 410, Raleigh, North Carolina 27612. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to mdq@lewis-roberts.com.

WHEREFORE, NC WARN respectfully requests that it be allowed to intervene in the above-mentioned docket.

This the 10th day of June, 2022

/s/ Matthew D. Quinn
Matthew D. Quinn
N.C. Bar No. 40004
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
Raleigh, North Carolina 27612
mdq@lewis-roberts.com
Telephone: 919-981-0191
Facsimile: 919-981-0199

Attorney for NC WARN

VERIFICATION


I, Matthew D. Quinn, verify that the contents of the foregoing Petition to Intervene are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of NC WARN.

This the 10th day of June, 2022.



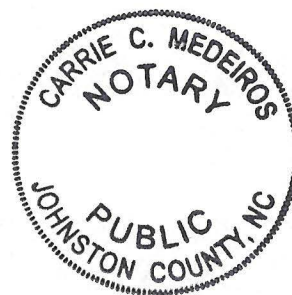
Matthew D. Quinn

Sworn to and subscribed before me,
this the 10th day of June, 2022.



Notary Public

My commission expires: 2/13/2023



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record by email transmission.

This the 10th day of June, 2022.

/s/ Matthew D. Quinn

Matthew D. Quinn

OFFICIAL COPY

Jun 10 2022