STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-22, SUB 658

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Consideration of Certain Standards for Electric Utilities Relating to Measures to Promote Greater Electrification of the Transportation Sector Pursuant to the Infrastructure Investment and Jobs Act

PETITION TO INTERVENE OF THE CAROLINA INDUSTRIAL GROUP FOR FAIR UTILITY RATES I (CIGFUR I)

NOW COMES the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), pursuant to Commission Rules R1-5 and R1-19 and respectfully submits this petition to intervene in the above-referenced docket. In support of this petition, CIGFUR I respectfully shows as follows:

- CIGFUR I is an association of industrial customers taking retail electric service from Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
- CIGFUR I's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. All correspondence related to this proceeding should be addressed to:

Christina D. Cress
Bailey & Dixon, LLP
434 Fayetteville St., Ste. 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
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- 3. As customers and ratepayers of DENC, the member companies belonging to CIGFUR I have direct, substantial, and pecuniary interest in this proceeding.
- 4. No other party is capable of adequately representing or protecting CIGFUR I's interests in this proceeding. As such, CIGFUR I should be permitted to intervene and participate as a party to this proceeding.
- 5. Pursuant to Commission Rule R1-39, CIGFUR I consents to electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR I respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 18th day of April, 2023.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
Christina D. Cress
N.C. State Bar No. 45963
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Attorneys for CIGFUR I

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR I; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters or 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.

This the 18th day of April, 2023.

Christina D. Cress

STATE OF NORTH CAROLINA COUNTY OF WAKE

Sworn to and subscribed before me

This 18 day of April, 2023, by Christina D. Cress.

Notary Public

Typed or Printed Notary Public Name

My Commission Expires: September 20, 2017

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR I hereby certifies that she caused the foregoing *Petition to Intervene of the Carolina Industrial Group for Fair Utility Rates I* to be served upon all parties of record to this proceeding by electronic mail.

This the 18th day of April, 2023.

/s/ Christina D. Cress Christina D. Cress