LAW OFFICES OF F. BRYAN BRICE, JR.

F. BRYAN BRICE, JR. CATHERINE CRALLE JONES ANNE M. HARVEY ANDREA C. BONVECCHIO ROBERT R. GELBLUM, OF COUNSEL 127 W. Hargett St., Ste. 600 Raleigh, NC 27601 Tel: 919-754-1600 fax: 919-573-4252 www.attybryanbrice.com

February 1, 2022

Ms. Kimberley A. Campbell, Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

> Re: Duke Energy Progress, LLC and Duke Energy Carolina, LLC Biennial Integrated Resources Plans and Carbon Plan Docket No. E-100, Sub 179

Dear Ms. Campbell,

Attached for filing in the above-referenced docket, on behalf of the Appalachian Voices, is the Petition to Intervene by Appalachian Voices and Request to Provide Comment on Stakeholder Process.

By copy of this letter, I am forwarding a copy to all parties of record by electronic delivery.

Sincerely,

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Catherine Cralle Jones

Enclosure(s)

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKETNO. E-100, SUB 179

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In the Matter of:
Duke Energy Progress, LLC and Duke Energy Carolina, LLC, 2022 Biennial Integrated Resource Plans and Carbon Plan

PETITION TO INTERVENE BY APPALACHIAN VOICES

AND

REQUEST TO PROVIDE COMMENT ON STAKEHOLDER PROCESS

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7 and R1-19, Appalachian Voices by and through undersigned counsel, hereby petitions to intervene and participate in the above-captioned proceeding.

In support of this petition, Appalachian Voices states as follows:

Petition to Intervene

1. Appalachian Voices is a regional, 501(c)(3) non-profit environmental organization with offices in Boone, North Carolina; Charlottesville and Norton, Virginia; and, Knoxville, Tennessee. The organization has approximately 20,000 members and supporters, including more than 4,000 in North Carolina, dedicated to protecting the land, air, and water of Central and Southern Appalachia and advancing a just transition to a generative and equitable clean energy economy. The North Carolina office address of Appalachian Voices is 589 W. King Street, Boone, NC 28607.

2. Appalachian Voices seeks to represent the interests of their thousands of members and supporters in North Carolina, many of whom are customers of Duke Energy Progress, LLC ("DEP") and Duke Energy Carolinas, LLC ("DEC"), in the

development of the Carbon Plan by which the Commission is directed to achieve a carbon reduction of 70% from 2005 levels by the year 2030 and carbon neutrality by the year 2050. The Carbon Plan development will directly and significantly affect the mission of Appalachian Voices, its interests, and members, who support a just transition to a generative and equitable clean energy economy.

3. Appalachian Voices and its members have a direct and substantial interest in these proceedings. Over the past decade our organization's work has focused on advancing access to energy efficiency and customer-owned distributed solar for residential electricity customers as a means for reducing low-income energy burden and improving quality of life. We are concerned that a Carbon Plan that focuses solely on utility-scale, utility-owned renewable energy resources and rapid decarbonization will exacerbate historical affordability challenges faced by low-income households, particularly African American and Hispanic households. Appalachian Voices seeks to intervene in this proceeding to further its mission and represent the interests of their members.

4. Appalachian Voices' goal for intervention is to ensure that the North Carolina Carbon Plan incorporates equity and affordability considerations and investments that benefit all Duke Energy customers. Our testimony and proposals for the Carbon Plan will be informed by our past involvement in the North Carolina Clean Energy Plan stakeholder process and associated working groups (A-1 and B-1), as well as our more recent involvement in the Comprehensive Rate Review process and the Low-Income Affordability Collaborative.

5. Appalachian Voices has previously intervened in numerous proceedings before the Commission on behalf of its North Carolina members and supporters.

6. The attorneys for Appalachian Voices to whom all correspondence and

filings in this docket should be addressed are:

Catherine Cralle Jones Andrea C. Bonvecchio Law Office of F. Bryan Brice, Jr. 127 W. Hargett Street, Suite 600 Raleigh, NC 27601 <u>cathy@attybryanbrice.com</u> andrea@attybryanbrice.com

7. The above counsel for Appalachian Voices, pursuant to Commission Rule

R1-39, agree to electronic service of all pleadings and other filings in this matter.

8. The attorneys for Appalachian Voices to whom all correspondence and

filings in this docket should be addressed are:

Catherine Cralle Jones Andrea C. Bonvecchio Law Office of F. Bryan Brice, Jr. 127 W. Hargett Street, Suite 600 Raleigh, NC 27601 <u>cathy@attybryanbrice.com</u> <u>andrea@attybryanbrice.com</u>

Request to Provide Comment on Stakeholder Process

9. Appalachian Voices participated in the January 25, 2022 stakeholder meeting, and has participated in a number of other related stakeholder meetings conducted on behalf of DEP and DEC.

10. Pursuant to NCUC Order Requiring Updates on Stakeholder Meetings,

issued January 21, 2022, and the NCUC Order Clarifying Opportunities for Public

Participation in the Development of the Carbon Plan Pursuant to HB 951, issued January

28, 2022, Appalachian Voices requests the opportunity to provide comment on the

stakeholder process at the NCUC meeting on February 7, 2022.

11. Appalachian Voices will submit the name, email and phone number for each participant by email to ncucwebex@ncuc.net on or before February 3, 2022.

WHEREFORE, Appalachian Voices respectfully requests that it be allowed to intervene in this docket, and that it be granted opportunity to provide comment on the stakeholder process at the February 7, 2022 meeting of the Commission.

Respectfully submitted this 1st day of February, 2022.

Catherine Cralle Jones N.C. State Bar No. 23733 Andrea Bonvecchio N.C. State Bar No. 56438 LAW OFFICE OF F. BRYAN BRICE, JR. 127 W. Hargett St., Ste. 600 Raleigh, N.C. 27601 Telephone: 919-754-1600 Facsimile: 919-573-4252 cathy@attybryanbrice.com andrea@attybryanbrice.com *Counsel for Appalachian Voices*

VERIFICATION

I, Rory D. McIlmoil, verify that the contents of the foregoing *Petition to Intervene* by Appalachian Voices and Request to Provide Comment on Stakeholder Process is 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 Appalachian Voices.

Rory D. McIlmoil Senior Energy Analyst Appalachian Voices

Sworn to and subscribed before me This the $__$ day of <u>Eebrug</u>, 2022

Notary Public

2025 Commission expires: "H



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Petition to Intervene and Request to Provide Comment on Stakeholder Process* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 1st day of Telemony , 2022.

LAW OFFICE OF F. BRYAN BRICE, JR.

coloque By: Catherine Cralle Jones