

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 175

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Biennial Determination of Avoided Cost  
Rates for Electric Utility Purchases from  
Qualifying Facilities – 2021

PETITION TO INTERVENE OF  
CIGFUR I, II, AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to Commission Rules R1-5 and R1-19 and the Commission's Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing issued in the above-referenced docket on August 13, 2021, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

1. CIGFUR I is an association of large customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
2. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP).
3. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC).
4. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at [cress@bdixon.com](mailto:cress@bdixon.com).

5. As purchasers of electric power from DENC, DEP, and DEC, the member companies of CIGFUR I, II, and III, respectively, have direct, substantial and pecuniary interests in this proceeding.
6. CIGFUR's participation in these dockets will bring the important perspective of large, high load factor industrial customers of DENC, DEP, and DEC, particularly with regard to whether proposed modifications to existing power purchase agreements are just and reasonable to all classes of customers of DENC, DEP, and DEC, respectively; in the public interest; and would result in immediate or long-term cost reductions for all classes of customers of DENC, DEP, and DEC, respectively.
7. CIGFUR's attorney, to whom all communications and pleadings should be addressed, is shown below:

Christina D. Cress  
434 Fayetteville Street, Suite 2500  
P.O. Box 1351 (zip 27602)  
Raleigh, NC 27601  
(919) 607-6055  
[ccress@bdixon.com](mailto:ccress@bdixon.com)

8. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR should be permitted to intervene and participate as a party to this proceeding.
9. CIGFUR has frequently appeared before this Commission as an intervenor and its interest in avoided cost dockets has consistently been recognized by this Commission. *See, e.g.*, Docket No. E-100, Subs 127, 136, 140, 148, and 167.

10. Pursuant to Commission Rule R1-39, CIGFUR agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR 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 28<sup>th</sup> day of January, 2022.

**BAILEY & DIXON, LLP**

/s/ Christina D. Cress  
Christina D. Cress  
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*Attorneys for CIGFUR*

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR; 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.

This the 28<sup>th</sup> day of January, 2022.

Christina D. Cress

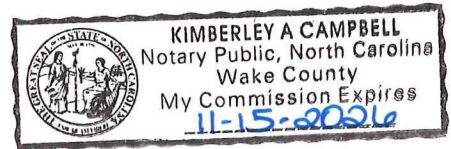
STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This 28<sup>th</sup> day of January, 2022, by Christina D. Cress.

Notary Public

Kimberley A. Campbell  
Typed or Printed Notary Public Name



My Commission Expires: 11-15-2026

**CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR hereby certifies that she caused the foregoing *Petition to Intervene* upon all parties of record to this proceeding by electronic mail.

This the 28<sup>th</sup> day of January, 2022.

/s/ Christina D. Cress  
Christina D. Cress