

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

)	
In the Matter of:)	
Biennial Consolidated Carbon Plan)	PETITION TO
and Integrated Resource Plans of)	INTERVENE OF
Duke Energy Carolinas, LLC, and)	APPALACHIAN VOICES
Duke Energy Progress, LLC, Pursuant to)	
N.C.G.S. § 62-110.9 and § 62-110.1(c))	

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, Appalachian Voices, through undersigned counsel, respectfully petitions to intervene and participate in the above-captioned docket. In support of this petition, Appalachian Voices states as follows:

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 33,000 members and supporters, including more than 3,700 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 its 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 and update of the Carbon Plan by which the Commission is directed to take all reasonable

steps to achieve a 70% reduction in emissions of carbon dioxide from 2005 levels by the year 2030 and carbon neutrality by the year 2050. The Carbon Plan's development and update 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. With respect to this docket, Appalachian Voices and its members have a direct and substantial interest in these proceedings. Since 1997, the organization has focused on advancing energy solutions that benefit communities in North Carolina and the greater Appalachian region. Over the past decade, the organization's work has focused on advancing access to energy efficiency and customer-owned distributed solar for residential electricity customers as a means to reduce low-income energy burden and improve quality of life. Furthermore, Appalachian Voices' members who are DEP and DEC customers will be directly affected by the Commission's decisions in this planning process.

4. Appalachian Voices seeks to intervene to ensure that its members' interest in affordable, reliable, and clean electricity are accounted for in this planning process. Its testimony will analyze the economic risk and viability of Duke Energy's proposed methane gas infrastructure buildout through its portfolios and supplemental analysis in light of proposed federal regulation, changing market conditions, and carbon reduction mandates.

5. Appalachian Voices has previously intervened and actively participated in numerous proceedings before the Commission on behalf of its North Carolina members and supporters, including the previous Carbon Plan proceeding (NCUC Docket No. E-100, Sub 179).

6. The attorneys for Appalachian Voices to whom all correspondence and filings in this docket should be addressed are:

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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.

WHEREFORE, for the reasons set forth above, Appalachian Voices respectfully requests that it be allowed to intervene in this docket.

Respectfully submitted this the 6th day of March, 2024.

/s/ Andrea C. Bonvecchio
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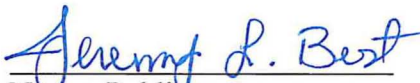
VERIFICATION

I, Andrea Bonvecchio, 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 Appalachian Voices.



Andrea C. Bonvecchio

Sworn to and subscribed before me
This the 6th day of March, 2024



Notary Public

Commission expires: 8/11/2024



CERTIFICATE OF SERVICE

I certify that I have on this day served a copy of the foregoing *Petition to Intervene of Appalachian Voices* 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 6th day of March, 2024.

LAW OFFICES OF F. BRYAN BRICE, JR.

By: /s/ Andrea C. Bonvecchio
Andrea C. Bonvecchio