

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-2, SUB 1287  
DOCKET NO. E-7, SUB 1261

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1287

In the Matter of  
Application by Duke Energy Progress, LLC,  
for Approval of Smart Saver Solar Energy  
Efficiency Program

DOCKET NO. E-7, SUB 1261

In the Matter of  
Application by Duke Energy Carolinas, LLC,  
for Approval of Smart Saver Solar Energy  
Efficiency Program

PETITION TO INTERVENE OF  
CIGFUR II AND III

NOW COME the 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 February 25, 2022 *Order Granting Second Extension of Time*, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

1. CIGFUR II is an association of purchasers of electric power from Duke Energy Progress, LLC (DEP).
2. CIGFUR III is an association of purchasers of electric power from Duke Energy Carolinas, LLC (DEC).

3. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at [ccress@bdixon.com](mailto:ccress@bdixon.com).
4. As customers and ratepayers of DEP and DEC, respectively, CIGFUR's member companies have direct, substantial, and pecuniary interests in this proceeding.
5. 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
6. CIGFUR's attorney, to whom all communications and pleadings should be addressed, is shown below:

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

7. 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 15<sup>th</sup> day of March, 2022.

**BAILEY & DIXON, LLP**

/s/ Christina D. Cress

Christina D. Cress

N.C. State Bar No. 45963

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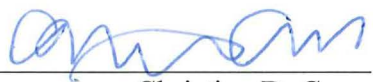
ccress@bdixon.com

*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 15<sup>th</sup> day of March, 2022.

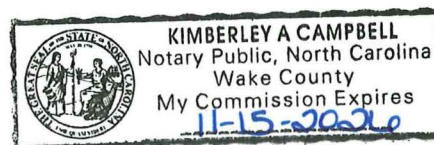
  
Christina D. Cress

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This 15<sup>th</sup> day of March, 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 of CIGFUR II & III* to be served upon all parties of record to this proceeding by electronic mail.

This the 15<sup>th</sup> day of March, 2022.

/s/ Christina D. Cress  
Christina D. Cress

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Mar 15 2022