

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-22, SUB 605

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application by Virginia Electric and)
Power Company, d/b/a Dominion Energy)
North Carolina, for Authority to Adjust its)
Electric Rates and Charges and Revise)
its Fuel Factor Pursuant to N.C. Gen.)
Stat. § 62-133.2 and NCUC Rule R8-55)

**PETITION TO INTERVENE OF
CIGFUR I**

NOW COMES the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), by and through the undersigned counsel, and files this petition to intervene pursuant to N.C. Gen. Stat. § 62-72 and Commission Rule R1-19. In support of its petition, CIGFUR I shows:

1. CIGFUR I is an association of purchasers of electric power from Dominion Energy North Carolina (DENC). CIGFUR I's member companies use electric power sold by DENC in the operation of their manufacturing plants.

2. CIGFUR I's mailing address is Post Office Box 1351, Raleigh, North Carolina, 27602-1351, and it may be contacted by email through its counsel at ccress@bdixon.com.

3. CIGFUR I's attorney, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress
Bailey & Dixon, LLP
P.O. Box 1351
Raleigh, NC 27602-1351
(919) 607-6055
ccress@bdixon.com

4. As purchasers of electric power from DENC, the members of CIGFUR I have direct, substantial, and pecuniary interests in this proceeding, and pursuant to Commission Rule R1-19, CIGFUR I has a right to intervene in this proceeding.


5. No other party is capable of adequately representing or protecting CIGFUR I's interests in this proceeding. As such, CIGFUR I has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

6. Pursuant to Commission rule R1-39, CIGFUR I agrees to electronic service of all pleadings and other papers in this docket.

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

This the 25th day of August, 2021.

BAILEY & DIXON, LLP

By: 
Christina D. Cress
N.C. State Bar No. 45963
Bailey & Dixon, LLP
Attorney for CIGFUR I
Post Office Box 1351
Raleigh, North Carolina 27602
(919) 607-6055
ccress@bdixon.com

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: 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 and 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.

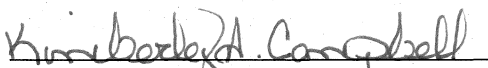
This the 25th day of August, 2021.


Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

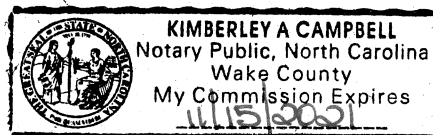
Sworn to and Subscribed before me

This the 25th of August, 2021, by Christina D. Cress.


Notary Public

Kimberley A. Campbell
Typed or Printed Notary Name

My Commission Expires: 11/15/2021



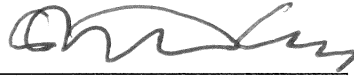
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Aug 25 2021

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR I hereby certifies that she served the foregoing Petition to Intervene upon the parties to this proceeding, as listed on the service list available on the NCUC's online docket system, by electronic mail.

This the 25th day of August, 2021.



Christina D. Cress
Bailey & Dixon, LLP
Attorney for CIGFUR I
Post Office Box 1351
Raleigh, North Carolina 27602
(919) 607-6055
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AUG 25 2021