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December 30, 2008

Ms. Renne Vance, Chief Clerk  
North Carolina Utilities Commission  
430 North Salisbury Street  
Raleigh, NC 27603

FILED  
DEC 30 2008  
Clerk's Office  
N.C. Utilities Commission

Re: Docket Nos. E-2, Sub 928, Sub 935, Sub 936, Sub 937 and Sub 938

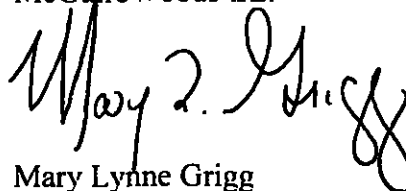
Dear Ms. Vance:

Enclosed for filing are the original and 30 copies of Public Service Company of North Carolina, Inc.'s Petition to Intervene and Comments in the above-referenced dockets.

Please give me a call if you have any questions. Thank you in advance for your assistance.

Very truly yours,

McGuireWoods LLP



Mary Lynne Grigg

MLG/jm

Clerk's  
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7 Comm  
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Watson  
Hoover  
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3/5 Elec

DOCKET NO. E-2, SUB 928  
DOCKET NO. E-2, SUB 935  
DOCKET NO. E-2, SUB 936  
DOCKET NO. E-2, SUB 937  
DOCKET NO. E-2, SUB 938

**OFFICIAL COPY**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 928

In the Matter of  
Petition for Approval of Residential Home  
Advantage Program, Commercial, Industrial and  
Governmental New Construction Program, and  
Commercial, Industrial, and Governmental  
Comprehensive Retrofit Program

DOCKET NO. E-2, SUB 935

In the Matter of  
Request by Carolina Power & Light  
Company, dba Progress Energy Carolinas,  
Inc. for Modification of Residential Home  
Advantage Program

DOCKET NO. E-2, SUB 936

In the Matter of  
Application by Carolina Power & Light  
Company, dba Progress Energy Carolinas,  
Inc. for Approval of Residential Home  
Energy Improvement Program

DOCKET NO. E-2, SUB 937

In the Matter of  
Request by Carolina Power & Light  
Company, dba Progress Energy Carolinas,  
Inc. for Approval of Residential Solar Water  
Heating Pilot Program

DOCKET NO. E-2, SUB 938

In the Matter of  
Application by Carolina Power & Light  
Company, dba Progress Energy Carolinas,  
Inc., for Approval of Commercial, Industrial, and  
Governmental Energy Efficiency Program

**FILED**  
**DEC 30 2008**  
Clerk's Office  
N.C. Utilities Commission

**PETITION TO INTERVENE  
AND COMMENTS OF PUBLIC  
SERVICE COMPANY OF NORTH  
CAROLINA, INC.**

Public Service Company of North Carolina, Inc. ("PSNC"), through counsel and pursuant to Rules R1-19 and R8-68(d) of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), respectfully requests the Commission enter an order allowing PSNC to intervene and submits the following comments in the above-referenced dockets. PSNC shows the Commission the following:

**Petition to Intervene**

1. Any notices or other communications with respect to this Petition should be sent to:

B. Craig Collins  
Assistant General Counsel  
SCANA Corporation  
MC-130  
1426 Main Street  
Columbia, SC 29201  
Telephone: 803-217-7513

And

Mary Lynne Grigg  
McGuireWoods LLP  
2600 Two Hannover Square  
Raleigh, NC 27601  
Telephone: 919-755-6573

2. PSNC is incorporated under the laws of the state of South Carolina, having its principal office and place of business in Gastonia, North Carolina. PSNC operates a natural gas pipeline system for the transportation, distribution, and sale of natural gas to approximately 446,000 winter-peak customers within a franchised area consisting of all or parts of twenty-eight (28) counties in central and western North Carolina. PSNC is a public utility under the laws of this State, and its public utility operations in North Carolina are subject to the jurisdiction of this Commission.

3. On December 1, 2008, Progress Energy Carolinas, LLC (“PEC”) filed in these dockets requesting approval of or modifications to its proposed Residential Home Advantage Program; Commercial, Industrial and Governmental New Construction Program; Commercial, Industrial and Governmental Comprehensive Retrofit Program; Residential Home Energy Improvement Program; Residential Solar Water Heating Pilot Program; and Commercial, Industrial and Governmental Energy Efficiency Program (collectively, the “Programs”).

4. PSNC is a competitor of PEC, and PSNC will be harmed to the extent the Programs cause current or prospective natural gas customers to use electricity instead of natural gas. Therefore, PSNC has a valid and substantial interest in this proceeding. This interest cannot be adequately represented by any other parties to this proceeding.

#### **Comments**

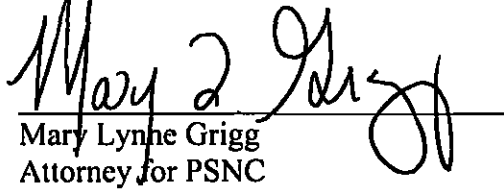
1. If approved, the Programs would offer customers incentives to install electric equipment, which could result in customers foregoing natural gas applications. PSNC submits that PEC’s conservation programs should not unduly influence fuel choice. This may have the effect of building, not reducing, PEC’s electric load.

2. PSNC has discussed its concerns regarding the Programs with PEC and, based on those discussions, PSNC believes that a resolution of the issues is possible. Therefore, PSNC is not filing objections to the Programs at this time, but respectfully reserves the right to object in reply comments, at any hearing, or at such other appropriate time if a settlement with PEC is ultimately not reached.

WHEREFORE, based on the foregoing, PSNC respectfully requests that the Commission issue an order allowing it to intervene and fully participate in the above-captioned proceedings.

Respectfully submitted this 30th day of December, 2008.

MCGUIREWOODS, LLP

  
Mary Lynne Grigg  
Attorney for PSNC

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