

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 83
DOCKET NO. E-100, SUB 180

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 83)	
)	
In the Matter of:)	
Investigation of Net Metering)	
)	
DOCKET NO. E-100, Sub 180)	PETITION TO INTERVENE OF
)	CIGFUR II AND III
)	
In the Matter of:)	
Investigation of Proposed Net Metering Policy)	
Changes)	

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 January 10, 2022 Order Requesting Comments, and files this petition to intervene in the above-referenced dockets. In support of this petition, CIGFUR shows as follows:

1. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP). CIGFUR II’s mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at cress@bdixon.com.
2. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC). CIGFUR III’s mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR III may be contacted by email through its counsel at cress@bdixon.com.
3. On November 29, 2021, DEC and DEP filed with the Commission a Joint Application for Approval of Revised Net Energy Metering Tariffs in Docket Nos. E-7, Sub 1214 and E-2, Subs 1219 and 1076 (Application). In the Application, DEC and DEP petition the

Commission to issue an order approving Duke's proposed net energy metering (NEM) tariffs for customers who submit applications on or after January 1, 2023.

4. On December 15, 2021, CIGFUR II and III filed a petition to intervene in the dockets listed in Paragraph 3 *supra*.

5. On January 7, 2022, the Commission issued an order granting CIGFUR II's petition to intervene in Docket No. E-2, Sub 1076, and to allow CIGFUR II and CIGFUR III, individually and/or jointly, to fully participate as parties in all three of the dockets listed in Paragraph 3 *supra*.

6. On January 10, 2022, the Commission issued an Order in Docket No. E-100, Sub 180 Requesting Comments on the Application, in which the Commission ordered in pertinent part that the Order should be served on all parties to the dockets listed in Paragraph 3 *supra*, in addition to Docket No. E-100, Sub 83, and "[t]hat on or before March 15, 2022, interested parties who have not previously been granted intervention in these dockets may file a petition to intervene[.]"

7. As ratepayers and purchasers of electric power from DEP and DEC, respectively, the member companies of CIGFUR II and CIGFUR III have direct, substantial, and pecuniary interests in this proceeding to the extent that any lost revenues or other costs associated with the NEM program proposed by Duke may be allocated to industrial customers and inasmuch as they continue to be disappointed by the fact that Duke is not currently proposing any net energy metering reform ideas geared toward commercial and industrial customers.

8. CIGFUR's participation in these dockets will bring the important perspective of several of Duke's largest high load-factor industrial customers. Moreover, CIGFUR was actively involved in the House Bill 951 stakeholder process and have actively participated in Duke's Comprehensive Rate Design Study during which the merits of the new NEM tariffs proposed by Duke in these dockets have been extensively discussed.

9. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

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10. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR 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.

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

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

Respectfully submitted this the 25th day of January, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
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VERIFICATION

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

This 25th day of January, 2022.




Christina D. Cress

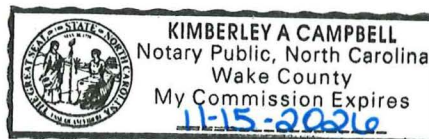
STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

this 25th day of January, 2022, by Christina D. Cress..


Notary Public


Typed or Printed Notary Public Name



My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

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

This the 25th day of January, 2022.

/s/ Christina D. Cress
Christina D. Cress