

DOCKET NO. E-100, SUB 190

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 190**

In the Matter of: Duke Energy Progress, LLC)

And Duke Energy Carolinas, LLC, 2024)

Biennial Integrated Resource Plans and)

Carbon Plan)

AMENDED PETITION TO

INTERVENE OF BRAD ROUSE

PURSUANT TO NCUC Rules R1-5, R1-7 and R1-19, I, Brad Rouse (AKA Harold Bradley Rouse) of Asheville, NC ("Petitioner"), filed a petition to intervene in the above captioned case on January 8, 2024. My petition was denied by order of the Commission on January 18, 2024. This denial order cited a variety of reasons which can be summarized as that my petition did not meet the standard of the above rules including that it had not demonstrated that I had an interest in the case that could not be served by the participation of other intervening parties or through stakeholder meetings and public comments.

In 2022 I filed a very similar petition in the preceding Carbon Plan case, Docket No. E-100, Sub 179, which was accepted by the Commission. I was not informed prior to my latest petition of any reinterpretation of the rules such that the same description of interests in 2022, which were accepted, would be denied in 2024. Given the Commission's revised interpretation of the rules, I now petition the Commission to consider the below revised information and grant my request to intervene:

My interests in Docket No. E-100 Sub 190:

1. I am a Duke Progress customer residing in Asheville, NC. I will be directly affected by the rate increases and local environmental impacts of the Carbon Plan selected and implemented by Duke Progress.
2. My early career was deeply involved in the utility industry and in the development of planning techniques that led many utilities and commissions to adopt an Integrated Resource Planning approach. As an employee of Data Resources, Inc, I led the development of the first economics-based load forecasting system for the Carolina Power and Light Company (CPL), which is now Duke Progress. The techniques used by Duke today are very similar to those developed by me and my team. As an employee of Energy Management Associates (EMA) in the 1980's and 1990's, I led the development of a suite of products for Integrated Resource Planning. One of those products was PROVIEW, an optimization tool that was used by Duke until it transitioned to ENCOMPASS. ENCOMPASS itself is an adaptation of the approach developed in

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PROVIEW made by former members of my organization who started a new company to create it. In the very real sense, I am one of the original authors of ENCOMPASS.

My authorship leads to another interest I have in this docket. During the 2022 proceedings, I concluded that Duke has been misusing ENCOMPASS, primarily by relying on short period optimization. I focused my final hearing brief on this misuse. The Commission recognized this issue in its order number 5 on December 30, 2022. Unfortunately, Duke was inadequately responsive to this order in its 2023 and 2024 filings, and the misuse continues at the very core of their proposed pathways, potentially leading to higher rates, greater carbon emissions, and billions in sunk costs. My interest is that I wish to ensure the Commission understands and focuses on correcting this misuse of my professional legacy.

3. I have been deeply involved in community activities to move Buncombe county to a cleaner energy future including co-founding Energy Savers Network, a non-profit project helping low-income people reduce energy consumption. This effort is part of the larger Blue Horizons Project which is a collaboration of Duke Energy, Buncombe County, and City of Asheville, and which is the result of orders from this commission as part of DOCKET NO. E-2, SUB 1089 to establish a community collaboration. I have been an active participant in this collaboration since its inception and am a member of the Blue Horizons Project Community Council. I served as technical and modeling lead for the 2023 development of the project's strategic plan for Buncombe County for 100% clean energy by 2042. This plan identified reducing the carbon intensity of power supplied by Duke as a pillar of our ability to meet these goals. Thus, I have an interest in Duke meeting or exceeding its decarbonization goals so that we can meet our local goals.
4. I have dedicated my personal and professional efforts to fighting the climate crisis for more than a decade. I volunteered an extensive amount of time to the 2022 Carbon Plan proceeding because it is an essential element of our region's response. I have a deep personal interest in this case as a result of my commitment to address the climate crisis.

It is not likely that other intervening parties or my providing public comments will adequately serve these interests.

Based on my experience intervening in the 2022 case, I understand that the AGO, Public Staff, or other intervenors are concerned about rates, about the need to reduce carbon emissions, about the ability of other entities to meet climate goals, and the hope that the final process has a good methodology and does not misuse a key analytical tool.

However, I do not believe that they can adequately represent the above interests in combination as there is no other intervenor that brings these four perspectives together as a whole. There is no other intervenor that is a customer of Duke, actively involved in climate issues for over a decade, deeply involved in an NC county's decarbonization efforts and who is an originating author of the key analytical tool used by Duke. Due to the complex technical nature of my concerns, I do not believe that public commentary

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alone is sufficient to serve my interests. I ask the Commission to reconsider in light of this additional information and approve my amended petition to intervene.

The Petitioner to whom all correspondence and filings in this docket should be addressed is:

Brad Rouse
3 Stegall Lane
Asheville, NC 28805
Telephone: 404.754.0892
Email: brouse_invest@yahoo.com

Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to brouse_invest@yahoo.com.

WHEREFORE, for the foregoing reasons, Brad Rouse respectfully requests that the Commission:

1. Grant his request that he be permitted to intervene and become a party to this docket.
2. Grant his request that he be permitted to file comments and other papers, examine witnesses, and be heard on matters relative to the issues involved in this docket; and
3. Grant him such other and further relief as the Commission deems just and proper.

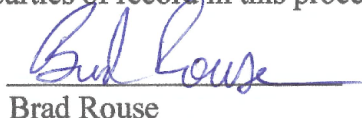
Respectfully submitted this 13th day of March 2024.



Brad Rouse

CERTIFICATE OF SERVICE

The undersigned certifies that he has served a copy of the foregoing PETITION TO INTERVENE IN NCUC DOCKET E-100 Sub 190, Carbon Plan of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC upon the parties of record in this proceeding by email, this the 13th day of March 2024.



Brad Rouse

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VERIFICATION

I, Brad Rouse, verify that the contents of the foregoing Petition to Intervene are true to the best of my knowledge, except for those matters stated on information and belief, and as for those matters, I believe them to be true.

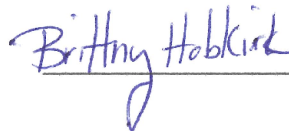

Brad Rouse

Buncombe County, North Carolina

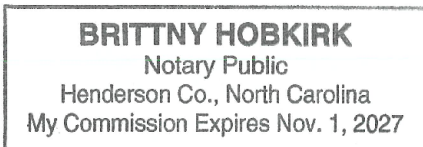
Sworn to and subscribed before me this day by Brad Rouse this 13th day of March 2024.

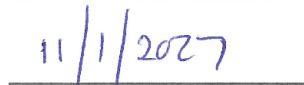


Signature

, Notary Public

My commission expires:





OFFICIAL COPY

Mar 14 2024