

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1283

DOCKET NO. E-7, SUB 1259

In the Matter of:)	
Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Request the Commission to Hold a Joint Hearing with the Public Service Commission of South Carolina to Develop Carbon Plan)	PETITION TO INTERVENE BY SOUTHERN ALLIANCE FOR CLEAN ENERGY, SIERRA CLUB, AND NATURAL RESOURCES DEFENSE COUNCIL

PURSUANT TO North Carolina Utilities Commission (“Commission”) Rule R1-19, Southern Alliance for Clean Energy, the Sierra Club, and the Natural Resources Defense Council (collectively, “Petitioners”) file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. Southern Alliance for Clean Energy (“SACE”) is a regional nonprofit organization whose mission is to promote responsible energy choices to address the impacts of global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electricity service from utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast’s energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy and wind energy through education and outreach in order to improve public health, the environment and the economy. SACE has its principal office in Tennessee, with a mailing address of Post

Office Box 1842, Knoxville, TN 37901, and also has offices in North Carolina, South Carolina, Florida and Georgia.

2. The Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club works to accelerate the transition from dirty fuels like coal and gas to clean energy solutions like solar, wind and energy efficiency, and advocates for state and federal policies and industry action to achieve this transition. The Sierra Club has a long history of working to reduce air pollution from coal-fired power plants and to promote clean energy sources in North Carolina, and its members include customers of our state's regulated electric utilities. The address of the Sierra Club's principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601.

3. The Natural Resources Defense Council ("NRDC") is a national environmental organization with over 30 years' experience working on state energy policy, including utility regulation and energy efficiency. NRDC, and its members in North Carolina who receive electricity service from electric utilities regulated by the Commission, have a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies. NRDC works to promote renewable energy and to advocate for the passage and implementation of clean energy standards and other policies that expand the market for wind and solar power. NRDC also works to promote energy efficiency and conducts research, partners with

manufacturers, and advocates for policies that create dramatic energy savings. Likewise, NRDC encourages states to fully account for efficiency potential when they forecast whether they need new power plants or transmission lines in order to avoid costly infrastructure and lower customers' bills. NRDC has headquarters at 40 West 20th Street, New York, New York 10011, and also has an office in Asheville, North Carolina.

4. Petitioners and their members have a direct and substantial interest in the operations of North Carolina electric utilities. Petitioners and their members are interested in promoting greater reliance on energy efficiency and renewable energy by electric utilities in North Carolina. Moreover, Petitioners' members who receive electricity service at their homes and businesses from the utilities operating in our state will be affected by decisions made by the utilities in their planning processes—and by the Commission in this and future related proceedings, such as new plant certifications and rate cases.

5. Petitioners seek to intervene in this proceeding in order to participate in this important matter concerning the provision of electricity in our state. If allowed to intervene, Petitioners will advocate for a proceeding that results in a low-cost, low-risk, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts. Thus, Petitioners will evaluate Duke Energy's proposal, evaluate the potential shortcomings and risks, and offer alternative procedures if necessary.

6. The attorneys for Petitioners to whom all correspondence and filings in this docket should be addressed are:

Gudrun Thompson
Nicholas Jimenez
Tirrill Moore

Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to gthompson@selcnc.org, njimenez@selcnc.org, and tmoore@selcnc.org.

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 20th day of December, 2021.

s/Gudrun Thompson

Gudrun Thompson

N.C. Bar No. 28829

Nicholas Jimenez

N.C. Bar No. 53708

Tirrill Moore

N.C. Bar No. 52299

SOUTHERN ENVIRONMENTAL LAW CENTER

601 W. Rosemary Street, Suite 220

Chapel Hill, NC 27516

Telephone: (919) 967-1450

Fax: (919) 929-9421

gthompson@selcnc.org

*Attorneys for Southern Alliance for Clean Energy,
Sierra Club, and Natural Resources Defense
Council*

VERIFICATION

I, Terrill Moore, verify that the contents of the foregoing Petition to Intervene are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council.

[Signature]

Date: 12/20/21

Wake (90)

Durham County, North Carolina

Sworn to and subscribed before me this day by Grace Halenore Overstreet

This 20th day of December, 2021.



[Signature]
Signature

Grace Halenore Overstreet, Notary Public

My commission expires: 12.4.2026

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene by Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council as filed today in Docket Nos. E-2, Sub 1283 and E-7, Sub 1259 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 20th day of December, 2021.

s/Gudrun Thompson