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JOHN D. RUNKLE
ATTORNEY AT LAW
POST OFFICE BOX 3793
CHAPEL HILL, N.C. 27515-3793

FILED

SEP 28 2009

Clerk's Office
N.C. Utilities Commission

919-942-0600 (o&f)
jrunkle@pricecreek.com

September 25, 2009

Renne C. Vance
Chief Clerk
NC Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

Re: Docket No. E-100, Sub 124

Dear Ms. Vance:

Please find for filing the original and 30 copies of the MOTION TO INTERVENE BY NC WARN. I am submitting an additional copy to be stamped "filed" and returned to me in the enclosed envelope.

Thank you for your attention to this matter.

Sincerely,



John D. Runkle
Counsel for NC WARN

cc. Service List – via email

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STATE OF NORTH CAROLINA
UTILITIES COMMISSION
DOCKET NO. E-100, SUB 124

FILED
SEP 28 2009
Clerk's Office
N.C. Utilities Commission

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Investigation of the Integrated Resource
Plan in North Carolina for 2009

)
) MOTION TO INTERVENE
) BY NC WARN

PURSUANT TO NCUC Rule R1-19, now comes the North Carolina Waste Awareness and Reduction Network, Inc. ("NC WARN"), through the undersigned attorney, with a motion to allow it to intervene in this docket. In support of the motion is the following:

1. NC WARN is a not-for-profit corporation under North Carolina law, with approximately 1000 individual members and families across the state. Its purpose is to reduce hazards to public health and the environment from nuclear power and other polluting electricity production through energy efficiency and renewable energy resources. Its address is NC WARN, Post Office Box 61051, Durham, North Carolina 27715-1051.

2. The attorney for NC WARN to whom all correspondence and filings should be addressed is John Runkle, Attorney at Law, Post Office Box 3793, Chapel Hill, North Carolina 27515. Rule 1-39 service by email is acceptable and may be sent to jrunkle@pricecreek.com.

3. Most of NC WARN's members are customers of the electric utilities in North Carolina and use electric power supplied by those utilities in their homes and businesses. These members are concerned about the cost of energy and the impacts from constructing new power plants to meet an increase in demand.

4. NC WARN has intervened in the past several IRP proceedings and other related dockets before the Commission. If allowed to intervene in this docket, NC WARN will advocate that the Commission investigate the need for new power plants and ability of energy efficiency and renewable energy to meet that need at a reasonable cost to the consumers.

THEREFORE, NC WARN prays that it be allowed to intervene in this matter and fully participate in the Commission's deliberations.

Respectfully submitted, this the 25th day of September 2009.

A handwritten signature in black ink, appearing to read "John D. Runkle", is written over a horizontal line.

John D. Runkle
Attorney at Law
P.O. Box 3793
Chapel Hill, N.C. 27515
919-942-0600 (o&f)
jrunkle@pricecreek.com

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served this MOTION TO INTERVENE BY NC WARN (E-100, Sub 124) by deposit in the U.S. Mail, postage prepaid, or by email transmission to:

Robert W. Kaylor
The Kaylor Law Firm
3700 Glenwood Ave. Ste 330
Raleigh, NC 27612

Richard M. Feathers
NC EMC
PO Box 27306
Raleigh, NC 27611

Len S. Anthony
Progress Energy Services, Inc.
P.O. Box 1551/PEB 17A4
Raleigh, NC 27602

Douglas W. Johnson
Blue Ridge EMC
PO Box 112
Lenoir, NC 28645

Lisa S. Booth
Counsel
Dominion NC Power
PO Box 26532
Richmond, VA 23261

Joseph H. Joplin
Rutherford EMC
PO Box 1569
Forest City, NC 28043-1569

Horace P. Payne
Senior Counsel
Dominion NC Power
PO Box 26532
Richmond, VA 23261

Ralph McDonald
Bailey & Dixon
P.O. Box 1351
Raleigh, NC 27602-1351

Antoinette R. Wike
Chief Counsel
Public Staff
4326 Mail Service Center
Raleigh, NC 27699-4326

Robert F. Page
Crisp Page & Currin
4010 Barrett Dr., Ste 205
Raleigh, NC 27609-6622

Leonard G. Green
N.C. Department of Justice
Post Office Box 629
Raleigh, NC 27602-0629

Sharon Miller
CUCA
1708 Trawick Rd. Ste. 210
Raleigh, NC 27604-3897

This is the 25th day of September 2009



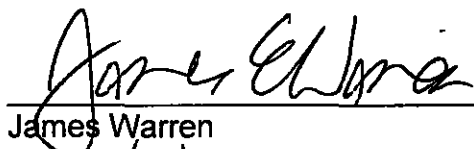
Attorney at Law

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
DOCKET NO. E-100, SUB 124

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)
Investigation of the Integrated Resource) VERIFICATION
Plan in North Carolina for 2009)

I, James Warren, Executive Director of the N.C. Waste Awareness and Reduction Network, verify that the contents of the MOTION TO ALLOW INTERVENTION BY NC WARN filed in this docket 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.


James Warren
date 9/21/09

Sworn to and subscribed before me,
this is the 21st day of September, 2009.


Notary Public

my commission expires: July 22, 2012