BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-7, SUB 1032

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In the Matter of:

Application for Approval of New Cost Recovery Mechanism and Portfolio for DSM and Energy Efficiency Programs MOTION FOR SUBSTITUTION OF COUNSEL FOR NATURAL RESOURCES DEFENSE COUNCIL, SOUTHERN ALLIANCE FOR CLEAN ENERGY, SOUTH CAROLINA COASTAL CONSERVATION LEAGUE, AND SIERRA CLUB OFFICIAL COPY

Sep 26 2023

Pursuant to R1-7, R1-22, and R1-23 of the Rules of the North Carolina Utilities Commission ("Commission") and Rule 1.16 of the North Carolina State Bar Rules of Professional Conduct, the Natural Resources Defense Council ("NRDC"), the Southern Alliance for Clean Energy ("SACE"), the South Carolina Coastal Conservation League ("SCCCL"), and the Sierra Club, by and through their undersigned counsel, move to substitute counsel of record in the above-captioned docket.

NRDC, SACE, SCCCL, and the Sierra Club wish to substitute David L. Neal and Munashe Magarira, both of the Southern Environmental Law Center ("SELC"), for Gudrun Thompson of SELC as counsel of record in this proceeding.

Mr. Neal is an attorney licensed in North Carolina and is a member in good standing of the North Carolina State Bar (No. 27992). Mr. Magarira, likewise, is an attorney licensed in North Carolina and a member in good standing of the North Carolina State Bar (No. 47904).

NRDC, SACE, SCCCL, and the Sierra Club request that Ms. Thompson be permitted to withdraw as their counsel of record, that she be removed from the service list, and that all future filings, orders and correspondence in this docket be served on Mr. Neal and Mr. Magarira:

> David L. Neal Munashe Magarira Southern Environmental Law Center 601 West Rosemary Street, Suite 220 Chapel Hill, NC 27516 Telephone: (919) 967-1450 Fax: (919) 929-9421 dneal@selcnc.org mmagarira@selcnc.org

WHEREFORE, NRDC, SACE, SCCCL, and the Sierra Club respectfully move the Commission for leave to substitute counsel by replacing Gudrun Thompson with David L. Neal and Munashe Magarira as counsel of record for NRDC, SACE, SCCCL, and the Sierra Club, in this proceeding.

Respectfully submitted this 26th day of September, 2023.

<u>/s/ Gudrun Thompson</u> N.C. Bar No. 28829 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

Attorney for the Natural Resources Defense Council, Southern Alliance for Clean Energy, South Carolina Coastal Conservation League, and the Sierra Club

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Withdrawal and Substitution of Counsel for the Natural Resources Defense Council, Southern Alliance for Clean Energy, South Carolina Coastal Conservation League, and the Sierra Club, as filed today in Docket No. E-7, Sub 1032, has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 26th day of September, 2023.

<u>s/ Gudrun Thompson</u>