

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1287
DOCKET NO. E-7, SUB 1261

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1287)	
)	
In the Matter of)	
Application by Duke Energy Progress, LLC)	<u>PETITION TO INTERVENE</u>
for Approval of Smart \$aver Solar Energy)	<u>BY NC WARN</u>
Efficiency Program)	
)	
DOCKET NO. E-7, SUB 1261)	
)	
In the Matter of)	
Application by Duke Energy Carolinas, LLC)	
for Approval of Smart \$aver Solar Energy)	
Efficiency Program)	

Pursuant to the North Carolina Utilities Commission’s (“NCUC” or “Commission”) Rule R1-19, NC WARN, through counsel, files this petition to intervene in the above-captioned dockets, and provides the following information in support of this petition:

1. NC WARN is a not-for-profit corporation organized and existing under the laws of the State of North Carolina. NC WARN has approximately one thousand individual members across the State, and its mission is to reduce hazards to public health and the environment from nuclear power, carbon emissions and other forms of electricity production. In furtherance of this mission, NC WARN actively works to promote the use of energy efficiency and renewable energy resources, including but not limited to rooftop solar. Therefore, NC WARN

is a frequent participant in NCUC dockets and stakeholder events involving Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, the “Companies”).

2. Most of NC WARN’s members reside in the State of North Carolina, and furthermore, many of NC WARN’s members are the Companies’ customers. Moreover, many of NC WARN’s members have installed rooftop solar, and it is expected that many of NC WARN’s members will install rooftop solar after January 1, 2023 and will therefore be directly impacted by the proposed Smart Saver Solar Energy Efficiency Program.

3. For these reasons, among others, NC WARN’s members have a direct vested interest in the relief sought by the Companies in the above-referenced docket. Moreover, the energy-efficiency issues in this docket implicate NC WARN’s core organizational mission and interests. Therefore, NC WARN and its members have a direct and substantial interest in this proceeding.

4. NC WARN’s address is Post Office Box 61051, Durham, North Carolina, 27715-1051.

5. The attorney for NC WARN to whom all correspondence and filings in this docket can be addressed is Matthew D. Quinn, Lewis & Roberts, PLLC, 3700 Glenwood Ave., Ste. 410, Raleigh, North Carolina 27612. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to mdq@lewis-roberts.com.

WHEREFORE, NC WARN respectfully requests that it be allowed to intervene in the above-mentioned dockets.

This the 19th day of January, 2022

/s/ Matthew D. Quinn
Matthew D. Quinn
N.C. Bar No. 40004
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
Raleigh, North Carolina 27612
mdq@lewis-roberts.com
Telephone: 919-981-0191
Facsimile: 919-981-0199

Attorney for Petitioner NC WARN

VERIFICATION

I, Matthew D. Quinn, 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 NC WARN.

This the 19th day of January, 2022.


Matthew D. Quinn

Sworn to and subscribed before me,
this the 19th day of January, 2022.

Elizabeth M. Cox
Notary Public

My commission expires: June 6, 2023



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record by email transmission.

This the 19th day of January, 2022.

/s/ Matthew D. Quinn

Matthew D. Quinn