

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 178

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:
Rulemaking Proceeding to Implement)
Performance-Based Regulation of) PETITION TO INTERVENE OF
Electric Utilities) CIGFUR I, II, AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to Commission Rules R1-5, R1-7, and R1-19, and file this petition to intervene in the above-referenced docket. In support of this petition, CIGFUR shows as follows:

1. CIGFUR I is an association of large customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC). CIGFUR I's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR I may be contacted by email through its counsel at cress@bdixon.com.

2. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP). CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at cress@bdixon.com.

3. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC). CIGFUR III's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR III may be contacted by email through its counsel at cress@bdixon.com.

4. As purchasers of electric power from DENC, the member companies of CIGFUR I have direct, substantial, and pecuniary interests in this proceeding.

5. As purchasers of electric power from DEP, the member companies of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding.

6. As purchasers of electric power from DEC, the member companies of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding.

7. CIGFUR's participation in this docket will bring the important perspective of large, high load-factor industrial customers of DENC, DEP, and DEC, respectively, to the rules governing performance-based regulation. Because performance-based regulation is a form of non-traditional ratemaking, the pecuniary interests of CIGFUR's member companies are directly and substantially implicated.

8. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress
Bailey & Dixon, LLP
P.O. Box 1351
Raleigh, NC 27602-1351
(919) 607-6055
ccress@bdixon.com

9. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

10. Pursuant to Commission Rule R1-39, CIGFUR agrees to electronic service of all pleadings and other papers in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing CIGFUR to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted this the 18th day of October, 2021.

BAILEY & DIXON, LLP



Christina D. Cress
NC Bar No. 45963
ccress@bdixon.com
Attorneys for CIGFUR
Post Office Box 1351
Raleigh, North Carolina 27602
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VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR.

This 18th day of October, 2021.

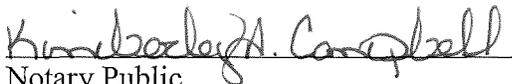


Christina D. Cress

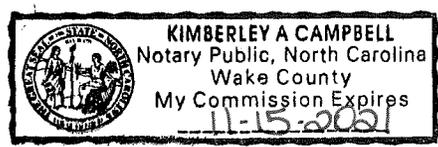
STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

this 18th day of October, 2021, by Christina D. Cress.



Notary Public



Kimberley A. Campbell

Typed or Printed Notary Public Name

My Commission Expires: 11-15-2021

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she served the foregoing Petition to Intervene upon the parties to this proceeding, as listed on the service list available on the NCUC's online docket system, by electronic mail.

This the 18th day of October, 2021.



Christina D. Cress