

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-34, SUB 54

In the Matter of:)	
Application of Appalachian State)	
University, d/b/a New River Light)	
And Power Company For)	PETITION TO INTERVENE
Adjustment of General Base Rates)	
And Charges Applicable to Electric)	
Service)	

PURSUANT TO North Carolina Utilities Commission (Commission or NCUC) Rule R1-19, Nancy LaPlaca, representing herself, files this petition to intervene in the above captioned docket, and provides the following information in support of her petition:

1. On December 22, 2022, Appalachian State University d/b/a New River Light and Power Company (NRLP), pursuant to N.C. Gen. Stat. §§ 62-133 and 134 and Commission Rules R1-5, R1-17, and R8-27, filed its application for authority to adjust and increase electric rates and charges.
2. Nancy LaPlaca, J.D., is a customer of NRLP, and owns a home at 239 Wildwood Lane, Boone NC 28607, with her partner, Dr. Douglas Goff James. Ms. LaPlaca is a nationally recognized expert in clean energy policy, including solar and other distributed energy resources (DERs). Ms. LaPlaca and Mr. James refinanced their home nearly three years ago, intending to use that money to put solar up on their home. However, due to NRLP’s untenable buy-all sell-all solar scheme, our household has not put up solar, as this provides zero benefit to our household or our community at large.

3. Ms. LaPlaca has been advocating for sensible climate and energy policies for over 17 years in the following roles: Policy Advisor to an elected public utilities commissioner (2009-2013) actively participating in hundreds of utility dockets, as an expert witness and intervener in dockets in Colorado and North Carolina, as a Boone Town Council member (2020-2021), a policy strategist for various non-profits on clean energy issues, clean energy advocate and researcher. Ms. LaPlaca has worked on various public policy issues for nearly four decades, including serving as staff to two congresspersons (U.S. Rep. Morris K. Udall and U.S. Rep. Karan English), appellate law clerk, grant program manager at a state supreme court, business process analyst for the software industry, and employee of the U.S. Department of Energy.
4. Ms. LaPlaca designed and taught three courses at Appalachian State University on energy policy and climate change (2019-2020) and continues to work with her former students and mentor¹ dozens of young people.
5. As both a customer of NRLP, an expert in solar policies, and a regulatory professional who has been working on electricity, energy and climate change for decades, Ms. LaPlaca and her household have been harmed by NRLP's policies as they have been unable to install rooftop solar because they would not be able to use a single kWh for their own use. Ms. LaPlaca seeks to intervene in this proceeding to ensure that her interests in addressing climate change, installing rooftop solar, promoting clean

¹ One of Ms. LaPlaca's former students is currently an energy policy advisor to current Arizona Governor Katie Hobbs, elected in November 2022.

energy jobs in solar and energy efficiency are realized before we tip into runaway climate change.²

6. Please direct all correspondence to:

Nancy LaPlaca
239 Wildwood Lane
Boone NC 28607
828-434-3423
Laplaca.nancy@gmail.com

WHEREFORE, Nancy LaPlaca requests that she be allowed to intervene in the docket.

Respectfully submitted this 30th day of May, 2023.

Nancy LaPlaca
239 Wildwood Lane
Boone NC 28607
828-434-3423
Laplaca.nancy@gmail.com

² <https://apnews.com/article/floods-united-nations-antonio-guterres-us-news-climate-71ab1abf44c14605bf2dda29d6b5ebcc> Statement by United Nations Secretary General Antonio Guterres, who warned that the world is facing “a direct existential threat” and must rapidly shift from dependence on fossil fuels by 2020 to prevent “runaway climate change.” The U.N. chief called the crisis urgent and decried the lack of global leadership to address global warming.