



Fox Rothschild LLP
ATTORNEYS AT LAW

Tel (919) 755-8700
Fax (919) 755-8800
www.foxrothschild.com

BENJAMIN L. SNOWDEN
Direct No: 919.719-1257
Email: BSnowden@foxrothschild.com

OFFICIAL COPY

Mar 28 2022

March 28, 2022

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

**RE: *In the matter of Duke Energy Progress, LLC and Duke Energy Carolinas, LLC
2022 Biennial Integrated Resource Plans and Carbon Plan and
2022 Solar Procurement Pursuant to Session Law 2021-165, Section 2(c)
NCUC Dockets E-2, Sub 1297 and E-7, Sub 1268
Clean Power Suppliers Association's Petition to Intervene***

Dear Ms. Dunston:

Pursuant to the Commission's March 11, 2022 Order Opening Separate Dockets and Establishing Procedural Deadlines, Clean Power Suppliers Association herewith provides its Petition to Intervene in the above referenced dockets and matters.

Should you have any questions concerning this request, please do not hesitate to contact me.

Sincerely,

/s/ Benjamin L. Snowden

Benjamin L. Snowden

pbb

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1297
DOCKET NO. E-7, SUB 1268

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
)	
Duke Energy Progress, LLC and Duke)	
Energy Carolinas, LLC 2022 Biennial)	
Integrated Resource Plans and Carbon)	
Plan)	
)	CLEAN POWER SUPPLIERS
And)	ASSOCIATION'S
)	PETITION TO INTERVENE
In the Matter of)	
Duke Energy Progress, LLC and Duke)	
Energy Carolinas, LLC 2022 Solar)	
Procurement Pursuant to Session Law)	
2021-165, Section 2(c))	

NOW COMES Clean Power Suppliers Association ("CPSA"), a North Carolina nonprofit association, pursuant to the North Carolina Utilities Commission's ("Commission") March 11, 2022 Order Opening Separate Dockets and Establishing Procedural Deadlines, and files this Petition to Intervene in the above-referenced dockets pursuant to Commission Rules R1-5, R1-7, and R1-19. In support thereof, CPSA shows the following:

1. CPSA is a non-profit corporation formed under the laws of North Carolina, with business members doing business in the State. CPSA's members are developers of independent solar generating facilities and include some of the largest developers and owner-operators of utility-scale solar in North and South Carolina. CPSA's members have been successful bidders in Duke Energy's CPRE competitive procurements and are likely

to bid into the 2022 procurement that is the subject of this docket. CPSA's mission is to promote a sustainable future through the development of zero-carbon electricity resources in the Carolinas.

2. CPSA is actively involved in the implementation of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and goals of the law implemented in a manner consistent with legislative intent.

3. CPSA has intervened and provided comments in docket E-100, Sub 179 and has been active in the recent stakeholder meetings that have been held in regard to same.

4. CPSA has actively participated in stakeholder meetings related to a 2022 procurement of solar resources, as authorized by H.B. 951.

5. CPSA's participation in these dockets will bring critical insight, knowledge, and understanding to the proceeding.

6. CPSA's principal office is located at 5310 South Alston Avenue, Building 300, Durham, NC 27713.

7. All communications and correspondence related to this proceeding should be addressed to Regulatory Counsel for CPSA as follows:

Benjamin L. Snowden
Fox Rothschild LLP
434 Fayetteville Street
Suite 2800
Raleigh, NC 27601
Telephone: 919-719-1257
E-mail: BSnowden@foxrothschild.com

8. Pursuant to Commission Rule R1-39, CPSA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, CPSA prays that it be allowed to intervene in this matter.

Respectfully submitted this the 28th day of March, 2022.

FOX ROTHSCHILD LLP



Benjamin L. Snowden
North Carolina State Bar No. 51745
434 Fayetteville Street
Suite 2800
Raleigh, NC 27601
Telephone: 919-719-1257
E-mail: BSnowden@foxrothschild.com

*Counsel for Clean Power Suppliers
Association*

VERIFICATION

Steven J. Levitas, being first duly sworn, deposes and says: that he is the Chairman of CPSA, that he has read the foregoing Petition to Intervene and knows the contents thereof to be true and correct of his own personal knowledge, except as to those matters therein stated upon information and belief, and as to those, he believes them to be true and correct. In his capacity as Chairman, he is authorized to sign this Verification on behalf of CPSA.

This the 28th day of March, 2022.



Steven J. Levitas, Chairman

NORTH CAROLINA
WAKE COUNTY

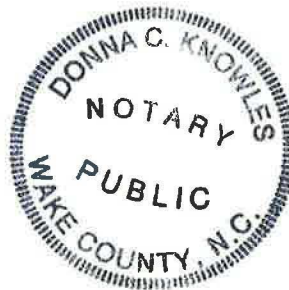
Sworn to and subscribed before me,
this 28th day of March, 2022.


Notary Public

Donna C. Knowles
Printed Name of Notary Public

My Commission Expires: October 23, 2023

(SEAL)



CERTIFICATE OF SERVICE

I hereby certify that all persons on the Commission's docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U. S. mail, postage pre-paid, or by e-mail transmission with the party's consent.

This the 28th day of March, 2022.

/s/ Benjamin L. Snowden

Benjamin L. Snowden
Fox Rothschild LLP
434 Fayetteville Street
Suite 2800
Raleigh, NC 27601
Telephone: 919-719-1257
E-mail: BSnowden@foxrothschild.com