

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-2, SUB 1292  
DOCKET NO. E-2, SUB 1293  
DOCKET NO. E-2, SUB 1294  
DOCKET NO. E-2, SUB 1295  
DOCKET NO. E-2, SUB 1296

DOCKET NO. E-7, SUB 1292 )

In the Matter of )  
Application of Duke Energy Progress, )  
LLC R8-55 Relating to Fuel and Fuel- )  
Related Charge Adjustments for Electric )  
Utilities )

DOCKET NO. E-7, SUB 1293 )

In the Matter of )  
Application of Duke Energy Progress, )  
LLC, for Approval of Renewable )  
Energy and Energy Efficiency Portfolio )  
Standard (REPS) Compliance Report )  
and Cost Recovery Rider Pursuant to )  
N.C.G.S. § 62-133.8 and Commission )  
Rule R8-67 )

CUCA'S PETITION TO INTERVENE

DOCKET NO. E-7, SUB 1294 )

In the Matter of )  
Application of Duke Energy )  
Progress, LLC for Approval of )  
Demand-Side Management and )  
Energy Efficiency Cost Recovery )  
Rider Pursuant to N.C. Gen. Stat. § )  
62-133.9 and Commission Rule R8- )  
69 )

DOCKET NO. E-7, SUB 1295 )

In the Matter of )  
Application of Duke Energy )  
Progress, LLC For Approval of Joint )  
Agency Asset Rider for Recovery of )

Costs Related to Facilities Purchased )  
 from Joint Power Agency Pursuant to )  
 N.C. Gen. Stat. §62-133.14 and Rule )  
 R8-70 )  
 )  
 DOCKET NO. E-7, SUB 1295 )  
 )  
 In the Matter of )  
 Application of Duke Energy )  
 Progress, LLC Pursuant to G.S. 62- )  
 110.8 and Commission Rule R8-71 )  
 Relating to CPRE Compliance Report )  
 and CPRE Cost Recovery Rider )

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-captioned dockets. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and addresses of its principal officers are

Chair: David J. Lyons  
 Gerdau Long Steel North America  
 384 Old Grassdale Road NE  
 Cartersville, GA 30121

Executive Director: Kevin N. Martin  
 Carolina Utility Customers Association, Inc.  
 8386 Six Forks Rd, Suite 103  
 Raleigh, NC 27615  
 kmartin@cucainc.org

3. CUCA’s attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA’s Executive Director Kevin Martin:

Marcus W. Trathen  
Craig D. Schauer  
Brooks, Pierce, McLendon,  
Humphrey & Leonard, LLP  
Suite 1700, Wells Fargo Capitol Center  
150 Fayetteville Street  
P.O. Box 1800 (zip 27602)  
Raleigh, NC 27601  
mtrathen@brookspierce.com  
cschauer@brookspierce.com

4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke Energy Progress, LLC (“DEP”) has been authorized by the Commission to sell electricity at retail.

5. CUCA’s member companies use electricity sold by DEP in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies. DEP’s filing will affect the rate associated with DEP’s sale of electricity to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

6. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceedings, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

Respectfully submitted, this 16th day of June, 2022.

/s/ Craig D. Schauer

Marcus W. Trathen

Craig Schauer

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Association, Inc.*

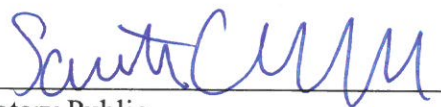
**VERIFICATION**

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and thing therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Carolina Utility Customers Association, Inc..

This the 16 day of June, 2022.



Sworn to and subscribed before me  
this 16 day of June, 2022.

  
\_\_\_\_\_  
Notary Public

**SAMANTHA L COCKERELL**  
NOTARY PUBLIC  
NEW HANOVER COUNTY, NC  
My Commission Expires Oct. 28, 2025

Commission Expires: 10/28/2025

**Certificate of Service**

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in this proceeding by electronic mail.

This the 16th day of June, 2022.

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, LLP

/s/ Craig D. Schauer