

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1300

In the Matter of:)	
Duke Energy Progress, LLC's)	
Request to Initiate Technical)	
Conference Regarding the)	NATURAL RESOURCES
Projected Transmission and)	DEFENSE COUNCIL'S PETITION
Distribution Projects to be Included)	TO INTERVENE AND NOTICE OF
in a Performance-Based Regulation)	INTENT TO PARTICIPATE
Application)	

PURSUANT TO Commission Rule R1-19, the Natural Resources Defense Council (NRDC), through counsel, files this petition to intervene alongside North Carolina Justice Center, North Carolina Housing Coalition, and Southern Alliance for Clean Energy (SACE) (collectively, Petitioners) in the above-captioned docket and notice of intent to participate in the technical conference, and provides the following information in support of its petition and notice:

1. On June 8, 2022, Duke Energy Progress, LLC (DEP), pursuant to Rule R1-17B(c), filed with the North Carolina Utilities Commission (Commission) a notice to initiate a technical conference regarding the projected transmission and distribution projects to be included in DEP's proposed general rate case application and performance-based regulation application (PBR Application). As indicated in the notice, DEP intends to file the general rate case application, which will include the PBR Application and the projected transmission and distribution projects, on or after October 6, 2022.

2. On July 5, 2022, Petitioners NC Justice Center, NC Housing Coalition, and SACE filed a Petition to Intervene and Notice of Intent to Participate

in the above-captioned docket. On July 7, 2022, the Commission granted their Petition to Intervene and Notice of Intent to Participate. NRDC requests to join in Petitioners' Intervention of the above-captioned docket.

3. The Natural Resources Defense Council is a national environmental organization with over 30 years' experience working on state energy policy, including utility regulation and energy efficiency. NRDC, and its members in North Carolina who receive electricity service from DEP, have a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies. NRDC works to promote renewable energy and to advocate for the passage and implementation of clean energy standards and other policies that expand the market for wind and solar power. NRDC also works to promote energy efficiency and conducts research, partners with manufacturers, and advocates for policies that create dramatic energy savings. Likewise, NRDC encourages states to fully account for efficiency potential when they forecast whether they need new power plants or transmission lines in order to avoid costly infrastructure and lower customers' bills. NRDC has headquarters at 40 West 20th Street, New York, New York 10011 and also has an office in Asheville, North Carolina.

4. The attorneys for the Petitioner to whom all correspondence and filings in this docket should be addressed are:

David Neal
Munashe Magarira
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to dneal@selcnc.org and mmagarira@selcnc.org.

WHEREFORE, NRDC requests that it be allowed to join in and intervene in this docket and provide the Commission with notice of their intent to participate in the technical conference regarding DEP's projected transmission and distribution projects.

Respectfully submitted this the 11th day of July, 2022.

/s/ David L. Neal

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VERIFICATION

I, David L. Neal, verify that the contents of the foregoing Petition to Intervene and Notice of Intent to Participate 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 Natural Resources Defense Council.



David L. Neal

Date: July 11, 2022

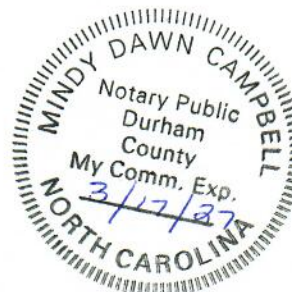
Durham County, North Carolina

Sworn to and subscribed before me this day by Munashe Magarira

This the 11th day of July, 2022


Signature

Mindy D. Campbell, Notary Public

My commission expires: March 17, 2027

CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Petition to Intervene and Notice of Intent to Participate either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 11th day of July, 2022.

/s/ David L. Neal
David L. Neal

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