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March 10, 2008

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FILED MAR 1 0 2008

Clerk's Office N.C. Utilities Commission

Ms. Renee Vance, Chief Clerk North Carolina Utilities Commission Dobbs Building, Fifth Floor 430 North Salisbury Street Raleigh, NC 27602

Re: Docket No. G-5, Sub 495

### VIA HAND DELIVERY

Dear Ms. Vance:

We enclose for filing in the above-referenced matter, on behalf of Carolina Utility Customers Association, Inc. ("CUCA"), an original and 32 copies of CUCA's Petition to Intervene. Kindly date-stamp and return to us via our courier the two additional enclosed copies. Please let me know, at your early convenience, if you have any questions concerning this filing.

Very truly yours,

CRISP, PAGE & CURRIN, L.L.P.

Robert F. Page

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Enclosures

cc: Ms. Sharon Miller Ms. Mary Lynne Grigg

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www.cpclaw.com WILLIAM T. CRISP II (1924-1992)

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Clerk's Office

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSIONC. Utilities Commission

#### DOCKET NO. G-5, SUB 495

In the Matter of ) Application of Public Service Company ) Of North Carolina, Inc. for a General ) Increase In its Rates and Charges )

Petition of Carolina Utility Customers Association, Inc. to Intervene

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, files this Petition pursuant to G.S. 62-72 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") that CUCA be permitted to intervene and participate in the above-captioned proceeding. In support of this petition, CUCA states as follows:

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 Suite 210, Trawick Professional Center, 1708 Trawick Road, Raleigh, North Carolina 27604. The names and addresses of its principal officers are:

Chair:	H. Gary Faw Ajimomoto Aminoscience 4020 Ajinomoto Drive Raleigh, NC 27610
Vice-Chair:	Peggy R. Claytor The Timken Company 1835 Dueber Avenue, SW Canton, Ohio 47706-2798
Executive Director:	Sharon C. Miller Carolina Utility Customers Association, Inc. Suite 210, Trawick Professional Center 1708 Trawick Road Raleigh, North Carolina 27604

2. CUCA's attorney, to whom all communications and pleadings should be

addressed is:

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Robert F. Page Crisp, Page & Currin, L.L.P. 4010 Barrett Drive, Suite 205 Raleigh, NC 27609 Telephone: (919)791-0009 Facsimile: (919)791-0010 Email: <u>rpage@cpclaw.com</u>

3. 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 Public Service company of North Carolina, Inc. ("PSC") has been authorized by the Commission to sell natural gas at retail.

4. CUCA's member companies use natural gas sold by PSC in the operation of their manufacturing plants. The availability of an adequate supply of natural gas at a reasonable price is critical to the economic viability of CUCA's member companies. PSC's proposal will increase the rates associated with the PSC's sale of natural gas 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.

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

This the Othday of March, 2008.

CRISP, PAGE & CURRIN, L.L.P.

Bv:

Robert F. Page N.C. State Bar No. 3307 4010 Barrett Drive, Suite 205 Raleigh, NC 27609 (919)791-0009

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#### STATE OF NORTH CAROLINA

#### VERIFICATION

#### COUNTY OF WAKE

Sharon C. Miller, being duly sworn, deposes and says that she is the Executive Director of Carolina Utility Customers Association, Inc., the intervenor herein; that she has read the foregoing Petition of Carolina Utility Customers Association, Inc., to intervene, and knows the contents thereof, and that the same is true of her own knowledge, except as to those matters therein stated upon information and belief, and as to those, she believes them to be true; and that she consents that this verified petition be used as an affidavit.

This the  $\underline{6^{+}}$  day of March, 2008.

Miller

SWORN to and subscribed before me, This the <u>4</u> day of March, 2008.

Notary Public My Commission Expires:

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