

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 179

<b>In the Matter of:</b> Duke Energy Progress, LLC, and Duke Energy Carolina, LLC, 2022 Biennial Integrated Resource Plans and Carbon Plan	) ) ) ) )	<b>PETITION TO INTERVENE BY CITY OF CHARLOTTE</b>
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**PETITION TO INTERVENE**

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1- 7, and R1-19, the City of Charlotte, through the undersigned attorney, respectfully requests that the North Carolina Utilities Commission enter an order permitting the City of Charlotte to intervene in the above-referenced docket. In support of this petition is the following:

1. On November 19, 2021, the Commission issued an Order Requiring Filing of Carbon Plan and Establishing Procedural Deadlines, which required Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Companies") to file an initial Carbon Plan by April 1, 2022.
2. On November 29, 2021, the Commission issued an Order extending the Companies' deadline to file their proposed Carbon Plan to May 16, 2022, and ordered intervening parties make their responsive filings by July 15, 2022.
3. The City of Charlotte ("City") is a municipal corporation organized under North Carolina law. Its address is City of Charlotte, 600 East 4th Street, Charlotte, NC 28202.
4. The attorney for the City to whom all correspondence and filings should be addressed is as follows:

Karen Weatherly  
 Senior Assistant City Attorney  
 600 East Fourth Street  
 Charlotte, NC 28202  
 704-249-7003 Phone  
 704-336-8022 Facsimile  
 Email: [karen.weatherly@charlottenc.gov](mailto:karen.weatherly@charlottenc.gov)

5. Pursuant to Commission Rule RI-39, the City agrees to electronic service of all pleadings and other filings in this matter.

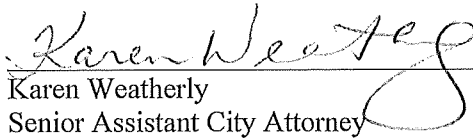
6. The City of Charlotte has an interest in the subject matter of this proceeding. The City Council-approved Strategic Energy Action Plan ("SEAP") sets municipal and city-wide carbon emissions reduction goals centered around energy generation, transportation, buildings, and equitable workforce development. The 2022 Biennial Integrated Resource Plans and Carbon Plan ("Carbon Plan") will have significant implications for the City's ability to achieve the ambitious SEAP goals. Duke Energy Carolinas is a critical partner in the achievements of these goals, and the Carbon Plan is an important opportunity to align our low carbon energy efforts. As a result, the City has a clear, direct and substantial interest in the matters to be addressed by the Commission. City participation in this docket will bring municipal government perspective, insight, knowledge, and understanding to the proceeding.

7. Intervention will give the City an opportunity to comment on the Carbon Plan and seek solutions that align with Commission, Duke Energy, and City SEAP goals.

**THEREFORE**, for the reasons set forth above, the City of Charlotte requests that it be allowed to intervene in this matter.

Respectfully submitted, this the 24<sup>th</sup> day of June, 2022.

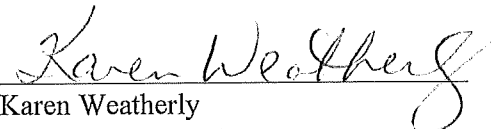
OFFICE OF THE CITY ATTORNEY

  
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VERIFICATION

Karen Weatherly, being duly sworn, deposes and says that she is an attorney for the City of Charlotte; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of the City of Charlotte.

This the 24<sup>th</sup> day of June, 2022

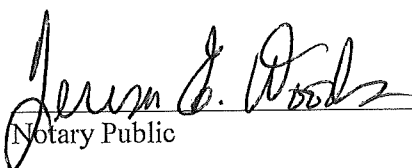


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NORTH CAROLINA  
MECKLENBURG COUNTY

Sworn to and subscribed before me,  
This the 24<sup>th</sup> day of June, 2022.

[AFFIX SEAL OF NOTARY]

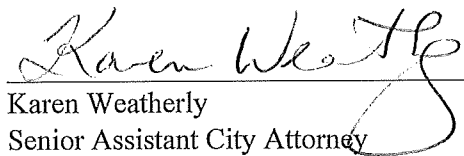
  
Notary Public

My commission Expires: 9-15-25

CERTIFICATE OF SERVICE

I hereby certify that all persons on the 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 email transmission with the party's consent.

This the 24<sup>th</sup> day of June, 2022.



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