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AUG 18 2017

Clerk's Office
N.C. Utilities Commission

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 150

In the Matter of)	NCEMC'S
Rulemaking Proceeding to Implement)	PETITION TO INTERVENE
G.S. 62-110.8)	

NOW COMES the North Carolina Electric Membership Corporation ("NCEMC") and, pursuant to North Carolina Utilities Commission ("Commission") Rules R1-7 and R1-19 and in accordance with the *Order Initiating Rulemaking Proceeding* issued by the Commission on July 28, 2017, files this *Petition to Intervene*.

NCEMC requests that it be permitted to intervene and participate in the above-captioned proceeding and shows unto the Commission as follows:

1. NCEMC's attorneys, to whom all communications and pleadings should be addressed are:

Richard M. Feathers
Senior Vice President and General Counsel
North Carolina Electric Membership Corporation
Post Office Box 27306
Raleigh, North Carolina 27611
Telephone: (919) 875-3121
Email: rick.feathers@ncemcs.com

Michael D. Youth
Associate General Counsel
Telephone: (919) 875-3060
Email: michael.youth@ncemcs.com

2. NCEMC is a generation and transmission cooperative responsible for the power supply of its 25 member distribution cooperatives throughout the State of North Carolina. NCEMC purchases power and energy, pursuant to wholesale contracts,

from Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and others to supply its members. These members, in turn, supply power to their members, the end-use retail consumers.

3. NCEMC has constructively participated in Commission dockets involving generic rulemaking in the past. See, e.g., Commission Docket No. E-100, Sub 113.
4. NCEMC has a vital interest in the matters at issue in this generic rulemaking proceeding and should be permitted to intervene and participate. By way of example (and not limitation), newly-amended N.C. Gen. Stat. § 62-110.8(f) uses the term “balancing authority area,” rather than service territory, to describe the anticipated geographic boundary for a renewable energy capacity trigger that will either require reduction of the competitively procured aggregate mandate, or alternatively, the implementation of additional competitive procurement. See, e.g., N.C. Gen. Stat. § 62-110.8(b)(1). Use of the “balancing authority area” term potentially encompasses NCEMC and its EMC members’ systems; NCEMC therefore has a direct interest in the construction of this phrase and the application of statutory provisions in which the defined phrase is found. The statute’s amendment also potentially implicates the siting of such projects, again using the term “balancing authority areas” to describe the siting authority of applicable public utilities. See, e.g., N.C. Gen. Stat. § 62-110.8(c). NCEMC and its EMC members obviously possess a keen interest in the potential siting of mandated projects in and around its assigned service territories. As one of the State’s electric power suppliers, NCEMC and its members are additionally interested in the potential system impact to reliability, distribution/transmission capacity and affected

systems (relatively certain to apply to cooperative infrastructure depending on project location) presented by the additional generation to be added through this competitive procurement.

5. No other party can adequately represent NCEMC's interests in this proceeding.
6. NCEMC agrees to accept electronic service of all filings in the Docket.
7. NCEMC asks that the Commission make it a party to this proceeding and to exercise all rights provided to intervenors under North Carolina law and this Commission's rules.

WHEREFORE, NCEMC requests that its *Petition to Intervene* be granted.

This the 15th day of August, 2017.

**NORTH CAROLINA ELECTRIC
MEMBERSHIP CORPORATION**

By: 

Richard M. Feathers
Senior Vice President & General Counsel
Post Office Box 27306
Raleigh, North Carolina 27611
Telephone: (919) 875-3121
Email: rick.feathers@ncemcs.com

STATE OF NORTH CAROLINA

COUNTY OF WAKE

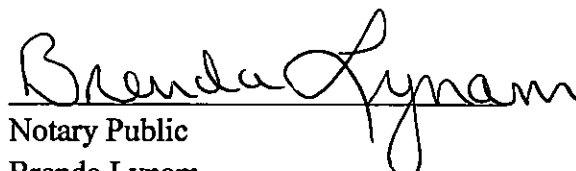
Richard M. Feathers, having been first duly sworn, deposes and says:

1. He is Senior Vice President and General Counsel for North Carolina Electric Membership Corporation.
2. He has read the foregoing Petition to Intervene and knows its contents.
3. The matters stated in this instrument are true of his knowledge, except as to those matters that are stated to be on information and belief, and, as to those matters, he believes them to be true.



Richard M. Feathers

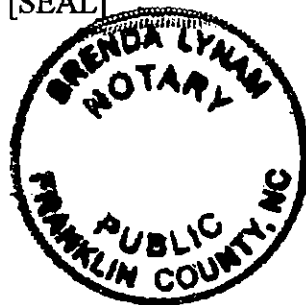
Sworn to and subscribed before me
This 15th day of August, 2017.



Notary Public
Brenda Lynam

My Commission Expires: 11/18/2018

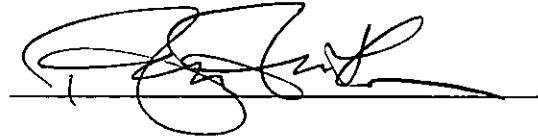
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document has been served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

This the 15th day of August, 2017.

A handwritten signature in black ink, appearing to be "J. J. [unclear]", is written over a horizontal line.