

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 175

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| In the Matter of: |) | |
| Biennial Determination of Avoided |) | |
| Cost Rates for Electric Utility |) | PETITION TO INTERVENE |
| Purchases from Qualifying Facilities – |) | |
| 2021 |) | |

PURSUANT TO Commission Rule R1-19 and the Commission’s August 13, 2021
Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public
Hearing, Appalachian Voices, through counsel, files this petition to intervene in the
above-captioned docket, and provides the following information in support of its petition:

1. Appalachian Voices is a non-profit environmental organization dedicated to bringing people together to solve the environmental problems having the greatest impact on the central and southern Appalachian Mountains. As part of its mission, Appalachian Voices advocates for solutions that not only protect the land, air, and water of this region, but that also foster resilient local economies and help ensure a just and equitable transition to a clean energy economy. This advocacy includes alternative rate options and cost-effective energy efficiency programs, conservation, and renewable energy resources as alternatives to heavily polluting coalfired power. Appalachian Voices advocates for equitable access to these renewable energy resources—especially for residential customers, including those living in multifamily structures.

2. Appalachian Voices is a regional, 501(c)(3) non-profit environmental organization with offices in Boone, North Carolina; Charlottesville and Norton, Virginia; and, Knoxville, Tennessee. The organization has approximately 20,000 members and supporters, including more than 4,000 in North Carolina, dedicated to protecting the land,

air, and water of Central and Southern Appalachia and advancing a just transition to a generative and equitable clean energy economy. The North Carolina office address of Appalachian Voices is 589 W. King Street, Boone, NC 28607.

3. Appalachian Voices and its members have a direct and substantial interest in this proceeding. Over the past decade the organization's work has focused on advancing access to energy efficiency and customer-owned distributed solar for residential electricity customers as a means for reducing low-income energy burden and improving quality of life. Many of Appalachian Voices' members are customers of North Carolina electric utilities and, therefore, are impacted by the utilities' energy resource selections and ratemaking practices. Appalachian Voices and its members are interested in promoting greater reliance on clean, low-cost energy resources to meet North Carolina's energy needs.

4. The attorneys for Appalachian Voices and Southern Alliance for Clean Energy, which has already intervened in this proceeding, to whom all correspondence and filings in this docket should be addressed are:

Nicholas Jimenez
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

Lauren J. Bowen
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
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Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to njimenez@selcnc.org and lbowen@selcnc.org.

WHEREFORE, Appalachian Voices requests that it be allowed to intervene in this docket.

Respectfully submitted this 9th day of February, 2022.

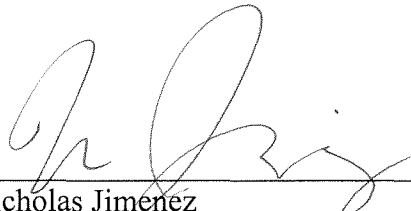
s/ Nick Jimenez

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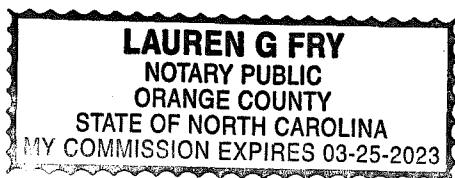
*Attorney for Appalachian Voices and Southern Alliance for
Clean Energy*

VERIFICATION

I, Nicholas Jimenez, verify that the contents of the foregoing Petition to Intervene 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 Appalachian Voices.


Nicholas Jimenez

Date: February 9, 2022.



Orange County, North Carolina

Sworn to and subscribed before me this day by Nicholas Jimenez.

This the 9 day of February, 2022.


Signature

Lauren G. Fry, Notary Public

My commission expires: March 25, 2023

CERTIFICATE OF SERVICE

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

This the 9th day of February, 2022.

s/ Nick Jimenez
Nick Jimenez