

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)	PETITION TO INTERVENE AND
Projected Transmission and)	NOTICE OF INTENT TO
Distribution Projects to be Included)	PARTICIPATE
in a Performance-Based Regulation)	
Application)	

PURSUANT TO Commission Rule R1-19, the North Carolina Justice Center ("NC Justice Center"), the North Carolina Housing Coalition ("NC Housing Coalition"), and the Southern Alliance for Clean Energy ("SACE") (collectively, "Petitioners"), through counsel, file this petition to intervene in the above-captioned docket and notice of intent to participate in the technical conference, and provide the following information in support of their 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. The NC Justice Center is a nonprofit research and advocacy organization whose mission is to eliminate poverty in North Carolina by ensuring

that every household in the state has access to the resources, services, and fair treatment it needs to achieve economic security. The NC Justice Center has offices at 224 S. Dawson Street, Raleigh, North Carolina 27601.

3. The NC Justice Center has previously intervened on behalf of low-income North Carolinians in proceedings involving DEP before the Commission on behalf of the low-income North Carolina residents that it represents, including recent general rate cases in Docket Nos. E-2, Sub 1142 and E-2, Sub 1219 and annual Demand-side Management/Energy Efficiency (“DSM/EE”) rider proceedings in Docket Nos. E-2, Sub 1206, E-2, Sub 1252, and E-2, Sub 1273.

4. The NC Justice Center and the low-income consumers whose interests it represents have a direct and substantial interest in this proceeding. Many of the low-income consumers represented by the NC Justice Center are customers of DEP and will therefore be subject to the direct impacts of DEP’s general rate case application, including costs relating to DEP’s planned transmission and distribution projects that it intends to include in the PBR Application. The NC Justice Center seeks to intervene in this proceeding and participate in the technical conference to ensure that its interests in promoting efficient and least-cost utility planning and its concerns about the energy burdens ultimately borne by low-income households are represented.

5. The NC Housing Coalition is a nonprofit membership organization with the goal of ensuring that every North Carolinian has access to safe, decent, and affordable housing. The principal address of the NC Housing Coalition is 3608 University Drive, Suite 203, Durham, NC 27707.

6. The NC Housing Coalition has previously intervened on behalf of low-income North Carolinians in proceedings involving DEP before the Commission on behalf of the low-income North Carolina residents that it represents, including recent general rate cases in Docket Nos. E-2, Sub 1142 and E-2, Sub 1219 and annual DSM/EE rider proceedings in Docket Nos. E-2, Sub 1206, E-2, Sub 1252, and E-2, Sub 1273.

7. The NC Housing Coalition and the low-income consumers whose interests it represents have a direct and substantial interest in this proceeding. The NC Housing Coalition has members who are customers of DEP and are therefore subject to the direct impacts of DEP's general rate case application, including costs relating to DEP's planned transmission and distribution projects that it intends to include in the PBR Application. The NC Housing Coalition works with its members to reduce the energy burdens faced by low-income residents. In addition, as part of its efforts to improve access to affordable housing for low-income individuals, the NC Housing Coalition advocates for fair and affordable utility rates and charges. The NC Housing Coalition seeks to intervene in this proceeding and participate in the technical conference to ensure that its members' interests in promoting efficient and least-cost utility planning and its concerns about the energy burdens ultimately borne by low-income households are represented.

8. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe, and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box

has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

9. SACE and its members have a direct and substantial interest in this proceeding. SACE has members who are customers of DEP and will therefore be subject to the direct impacts of DEP's general rate case application, including costs relating to DEP's planned transmission and distribution projects that it intends to include in the PBR Application. SACE seeks to intervene in this proceeding and participate in the technical conference to ensure that its members' interests in promoting transmission and distribution investments that will help advance the deployment of low-cost, clean, renewable energy in an affordable manner are represented.

10. SACE has previously intervened in DEP rate cases in Docket Nos. E-2, Sub 1142 and E-2, Sub 1219. In addition, SACE frequently appears before the Commission as an intervenor in DSM/EE rider proceedings, including in Docket Nos. E-2, Sub 1019, E-2, Sub 1030, E-2, Sub 1044, E-2, Sub 1070, E-2, Sub 1108, E-2, Sub 1174, E-2, Sub 1206, E-2, Sub 1252, and E-2, Sub 1273. SACE also participated actively in Docket No. E-2, Sub 931, and was a party to the DSM/EE Mechanism approved by the Commission in that docket.

11. The attorneys for the Petitioners 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, Petitioners request that they be allowed to 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 5th day of July, 2022.

/s/ David L. Neal

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VERIFICATION

I, Munashe Magarira, 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 North Carolina Justice Center, North Carolina Housing Coalition, and Southern Alliance for Clean Energy.




Munashe Magarira

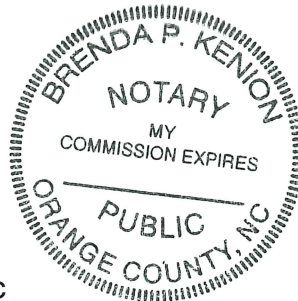
Date: July 5, 2022

Orange, North Carolina

Sworn to and subscribed before me this day by Munashe Magarira

This the 5th day of July, 2022


Signature



8-19-26, Notary Public
My commission expires:

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 5th day of July, 2022.

/s/ David L. Neal
David L. Neal