STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 180

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Investigation of Proposed Net Metering)

NC WARN'S PETITION

Policy Changes) TO INTERVENE

Pursuant to the North Carolina Utilities Commission's ("NCUC" or "Commission") Rules R1-5, R1-7, and R1-19, NC WARN, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of this petition:

- 1. NC WARN is a not-for-profit corporation organized and existing under the laws of the State of North Carolina. NC WARN has approximately one thousand individual members across the State, and its mission is to reduce hazards to public health and the environment from nuclear power, carbon emissions and other forms of electricity production. In furtherance of this mission, NC WARN actively works to promote the use of energy efficiency and renewable energy resources, including but not limited to rooftop solar. Therefore, NC WARN is a frequent participant in NCUC dockets and stakeholder events involving Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, the "Companies").
- Most of NC WARN's members reside in the State of North Carolina, and furthermore, many of NC WARN's members are the Companies' customers.
 Moreover, many of NC WARN's members have installed rooftop solar, and it is

expected that many of NC WARN's members will install rooftop solar after January 1, 2023 and will therefore be directly impacted by the net energy metering tariff proposed by the Companies.

- 3. For these reasons, among others, NC WARN's members have a direct vested interest in the relief sought by the Companies in the above-referenced docket. Moreover, the implications of the Companies' net energy metering proposal in this docket implicate NC WARN's core organizational mission and interests. Therefore, NC WARN and its members have a direct and substantial interest in this proceeding.
- 4. The Companies filed their *Joint Application for Approval of Net Energy Metering Tariffs* in Docket Nos. E-7 Sub 1214, E-2 Sub 1219 and E-2 Sub 1076. NC WARN was previously allowed to intervene in both Docket No. E-7 Sub 1214 and E-2 Sub 1219.
- 5. NC WARN's address is Post Office Box 61051, Durham, North Carolina, 27715-1051.
- 6. The attorney for NC WARN to whom all correspondence and filings in this docket can be addressed is Matthew D. Quinn, Lewis & Roberts, PLLC, 3700 Glenwood Ave., Ste. 410, Raleigh, North Carolina 27612. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to mdq@lewis-roberts.com.

WHEREFORE, NC WARN respectfully requests that it be allowed to intervene in the above-mentioned dockets.

This the 24th day of January, 2022

/s/ Matthew D. Quinn

Matthew D. Quinn
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Attorney for NC WARN

VERIFICATION

I, Matthew D. Quinn, 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 NC WARN.

This the 24th day of January, 2022.

Matthew D. Quinn

Sworn to and subscribed before me, this the day of January, 20

Notary Public

Notary Public

My commission expires:

Wake
County
My Comm. Exp.

06-06-2023

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record by email transmission.

This the 24th day of January, 2022.

/s/ Matthew D. Quinn

Matthew D. Quinn