

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-7, SUB 1214
DOCKET NO. E-2, SUB 1219
DOCKET NO. E-2, SUB 1076

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-7, SUB 1214)
)
 In the Matter of:)
 Application by Duke Energy Carolinas,)
 LLC, for Adjustment of Rates and Charges)
 Applicable to Electric Utility Service in)
 North Carolina)
)
 DOCKET NO. E-2, SUB 1219)
)
 In the Matter of:)
 Application of Duke Energy Progress, LLC,)
 for Adjustment of Rates and Charges)
 Applicable to Electric Utility Service in)
 North Carolina)
)
 DOCKET NO. E-2, SUB 1076)
)
 In the Matter of:)
 Notice of Duke Energy Progress Conversion)
 to Limited Liability Company)

PETITION TO INTERVENE OF
CIGFUR II AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to Commission Rules R1-5 and R1-19, and file this petition to intervene in the above-referenced dockets. In support of this petition, CIGFUR shows as follows:

1. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP). CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at cress@bdixon.com.

2. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC) (together with DEP, Duke). CIGFUR III's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR III may be contacted by email through its counsel at ccress@bdixon.com.

3. While CIGFUR II already is a party of record to Docket No. E-2, Sub 1219, CIGFUR III is not. Therefore, CIGFUR III seeks to intervene in Docket No. E-2, Sub 1219 as a result of the Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance With G.S. § 62-126.4 and House Bill 951 filed in these dockets on November 29, 2021.

4. While CIGFUR III already is a party of record to Docket No. E-7, Sub 1214, CIGFUR II is not. Therefore, CIGFUR II seeks to intervene in Docket No. E-7, Sub 1214 as a result of the Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance With G.S. § 62-126.4 and House Bill 951 filed in these dockets on November 29, 2021.

5. CIGFUR II and CIGFUR III both seek intervention in Docket No. E-2, Sub 1076 as a result of the Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance With G.S. § 62-126.4 and House Bill 951 filed in these dockets on November 29, 2021.

6. CIGFUR's participation in this docket will bring the important perspective of several of Duke's largest high load-factor industrial customers, who were actively involved in the House Bill 951 stakeholder process and who have actively participated in Duke's Comprehensive Rate Design Study, during which the merits of the new net energy metering tariffs proposed by Duke in these dockets have been discussed extensively.

7. As ratepayers and purchasers of electric power from DEP, the member companies of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding to the extent that any lost revenues or other costs associated with the NEM program proposed by Duke may be allocated to industrial customers and inasmuch as they continue to be disappointed by the fact that Duke is not currently proposing any net energy metering reform ideas geared toward commercial and industrial customers.

8. As ratepayers and purchasers of electric power from DEC, the member companies of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding to the extent that any lost revenues or other costs associated with the NEM program proposed by Duke may be allocated to industrial customers and inasmuch as they continue to be disappointed by the fact that Duke is not currently proposing any net energy metering reform ideas geared toward commercial and industrial customers.

9. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

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Bailey & Dixon, LLP
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10. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR has a vital interest in participating in the matters at issue in this proceeding and should be permitted to intervene and have full intervention rights as a party to this proceeding.

11. Pursuant to Commission Rule R1-39, CIGFUR agrees to electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing CIGFUR to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted this the 15th day of December, 2021.


BAILEY & DIXON, LLP

/s/ Christina D. Cress
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Attorneys for CIGFUR

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR; 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 CIGFUR.

This 15th day of December, 2021.

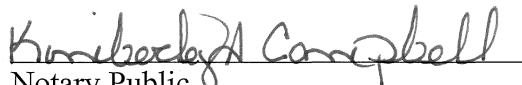


Christina D. Cress

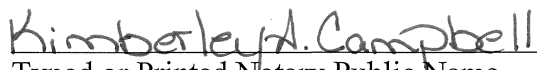
STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

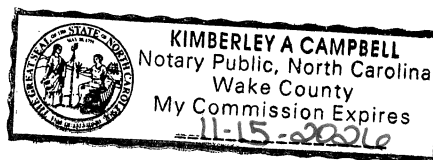
this 15th day of December, 2021, by Christina D. Cress..



Notary Public



Typed or Printed Notary Public Name




My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she served the foregoing Petition to Intervene upon the parties to this proceeding, as listed on the service list available on the NCUC's online docket system, by electronic mail.

This the 15th day of December, 2021.



Christina D. Cress