

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

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 RI-19 and the Commission's August 13, 2021 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing*, Southern Alliance for Clean Energy, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. Southern Alliance for Clean Energy (“SACE”) is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is: P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has a presence in Florida, Georgia, North Carolina and South Carolina.

2. SACE and its members have a direct and substantial interest in this proceeding. Many of SACE’s members are customers of North Carolina electric utilities and, therefore, are impacted by the utilities’ energy resource selections and ratemaking practices. SACE and its members are interested in promoting greater reliance on clean, low-cost energy resources to meet North Carolina’s energy needs.

3. SACE has intervened, filed comments, presented expert testimony, and participated in evidentiary hearings in prior biennial avoided cost proceedings, including E-100, Sub 136; E-100, Sub 140; E-100, Sub 148; E-100, Sub 158; and E-100, Sub 167.

4. The attorneys for SACE to whom all correspondence and filings in this docket should be addressed are:

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Southern Environmental Law Center
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Chapel Hill, NC 27516

Lauren J. Bowen
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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, SACE requests that it be allowed to intervene in this docket.

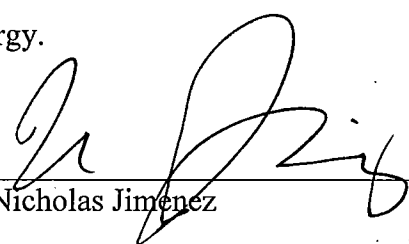
Respectfully submitted this 1st day of December, 2021.

s/ Nick Jimenez
Nicholas Jimenez
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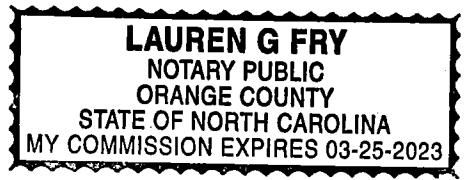
VERIFICATION

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 Southern Alliance for Clean Energy.



Nicholas Jimenez


Date: December 1, 2021.



Orange County, North Carolina

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

This the 1 day of December, 2021.



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 1st day of December, 2021.

s/ Nick Jimenez
Nick Jimenez