

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET No. E-100, Sub 165

In the Matter of)
2020 Biennial Integrated Resource Plans and)
Related 2020 REPS Compliance Plans)

PETITION FOR LEAVE TO PARTICIPATE IN TECHNICAL CONFERENCE

NOW COME ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1 (collectively “the Power Agencies”), pursuant to the Commission’s Order Scheduling Technical Conference And Requiring Report in this docket (the “Order”), who hereby request that they be allowed to make presentations and otherwise participate in the technical conference that is the subject of the Order.

In support of their request, the Power Agencies state the following:

1. The names and mailing address of the Petitioners are:

ElectriCities of North Carolina, Inc.
North Carolina Eastern Municipal Power Agency
North Carolina Municipal Power Agency Number 1
1427 Meadow Wood Blvd.
Raleigh, N.C. 27604

2. The name and address of Petitioners' attorney is:

Daniel C. Higgins
Burns, Day & Presnell, P.A.
P.O. Box 10867
Raleigh, N.C. 27605
dhiggins@bdppa.com

3. ElectriCities of North Carolina, Inc. (“ElectriCities”) is a joint municipal assistance agency organized pursuant to N.C. Gen. Stat. § 159B-43 by North Carolina

Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number

1. ElectriCities is a membership organization that provides aid and assistance to its agency members in connection with the operation of their electric systems. ElectriCities also provides management services to those agencies.

4. North Carolina Eastern Municipal Power Agency (“NCEMPA”) is a joint agency organized pursuant to Chapter 159B by its members, which consist of 32 cities located in that portion of eastern North Carolina served by the transmission systems of Duke Energy Progress, Inc. f/k/a Progress Energy Carolinas, Inc. (“DEP”), and Dominion North Carolina.

5. North Carolina Municipal Power Agency Number 1 (“NCMPA1”) is a joint agency organized pursuant to Chapter 159B by its members, which consist of 19 cities located in that portion of western North Carolina served by the transmission system of Duke Energy Carolinas, LLC.

6. The Power Agencies request that any notices, filings or other communications with respect to this Petition be served on the following:

Daniel C. Higgins
Burns, Day & Presnell, P.A.
P.O. Box 10867
Raleigh, N.C. 27605
dhiggins@bdppa.com

and

Jay Morrison
Chief Legal Officer
ElectriCities of North Carolina, Inc.
1427 Meadow Wood Blvd.
Raleigh, NC 27604
jmorrison@electricities.org

7. The Power Agencies' member municipalities are electric power suppliers who operate distribution systems to supply their end-user residents and retail customers with electric power in various parts of North Carolina. The vast majority of the power the NCEMPA's municipal members provide to their customers is purchased from Duke Energy Progress, LLC pursuant to a wholesale contract. The power that NCMPA1's municipal members provide to their customers is supplied by NCMPA1's ownership interest in the Catawba Nuclear Station and other owned and contracted resources. In addition, some of the Power Agencies' municipal members own and operate electric generation resources pursuant to authorizations provided by the Commission.

8. As electric power suppliers, the Power Agencies' municipal members have a real and substantial interest in the issues raised in this proceeding. No other party can adequately represent the interests of the Power Agencies and their members, and the Power Agencies' participation in this technical conference would be in the public interest.

9. The Power Agencies would expect to have from one to four personnel make a presentation at the technical conference, depending on the structure and level of granularity at which the issues identified in the Order are addressed during the conference. The Power Agencies are interested in providing their perspective on the possibility of involving public power distribution systems in the utility planning process.

10. The Power Agencies agree to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power

Agency Number 1 respectfully request that the Commission:

1. Grant the Power Agencies' request that they be permitted to make presentations during in the technical conference described in the Order and to otherwise participate in that conference; and

2. For such other and further relief as the Commission deems just and proper.

Respectfully submitted, this the 22nd day of January, 2021.

BURNS, DAY & PRESNELL, P.A.

By: 

Daniel C. Higgins

P.O. Box 10867

Raleigh, North Carolina 27605

Telephone: (919)782-1441

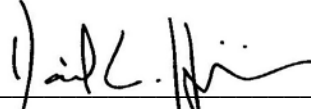
E-mail: dhiggins@bdppa.com

Attorneys for the Power Agencies

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was duly served upon counsel of record for the Public Staff and all parties to this docket by either depositing same in a depository of the United States Postal Service, first-class postage prepaid, addressed as shown below, or by electronic delivery, this the 22nd day of January, 2021.

BURNS, DAY & PRESNELL, P.A.

A handwritten signature in black ink, appearing to read 'Daniel C. Higgins', written over a horizontal line.

Daniel C. Higgins

Post Office Box 10867

Raleigh, NC 27605

Tel: (919) 782-1441