

SOUTHERN ENVIRONMENTAL LAW CENTER

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August 5, 2020

Via Electronic Filing

Ms. Kim Campbell
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

Re: In the Matter of: Application of Duke Energy Progress, LLC Pursuant to
N.C. Gen. Stat. § 62-133.2 and Commission Rule R8-55 Relating to Fuel
and Fuel-Related Charge Adjustments for Electric Utilities;
Docket No. E-2, Sub 1250

Dear Ms. Campbell:

I attach a Petition to Intervene for filing on behalf of the Sierra Club in the above-referenced docket, and request that the Commission accept the petition for filing despite the absence of the verification required by Commission rules. Our office is closed due to the coronavirus pandemic and our staff, including paralegals with notary credentials, are working remotely. A verification will be filed as soon as practicable and safe for our staff to execute the document in the presence of a notary public.

Please let me know if you have any questions about this filing.

Sincerely,

s/ Gudrun Thompson

GT
Enclosures
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1250

In the Matter of:)
Application of Duke Energy Progress,)
LLC Pursuant to N.C. Gen. Stat. § 62-)
133.2 and Commission Rule R8-55) **PETITION TO INTERVENE**
Relating to Fuel and Fuel-Related)
Charge Adjustments for Electric)
Utilities)

PURSUANT TO Commission Rule R1-19, the Sierra Club, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. N.C. Gen. Stat. § 62-133.2 authorizes the Commission to review changes and approve fuel and fuel-related costs for each electric public utility. On June 9, 2020, Duke Energy Progress, LLC (“DEP”) filed an application for approval to adjust the fuel and fuel-related cost component of its electric rates.

2. The Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club works to accelerate the transition from fossil fuels like coal and gas to clean energy solutions like solar, wind, and energy efficiency, and advocates for state and federal policies and industry action to achieve this transition. The Sierra Club has a long history of working to reduce pollution from fossil-fueled power plants and promoting clean energy resources in North Carolina.

3. The Sierra Club and its members have a direct and substantial interest in this proceeding. Pursuant to N.C. Gen. Stat. § 62-133.2 and NCUC Rule R8-55, in this annual fuel charge adjustment proceeding, the Commission examines DEP's fuel procurement practices and costs, and sets a rider to allow the utility to recover its fuel and fuel-related costs from customers. The Sierra Club's approximately 21,000 members in North Carolina include DEP customers whose service and rates will be affected by DEP's fuel procurement practices, fuel costs, and the rider established in this proceeding.

4. The address of the Sierra Club's principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601. The attorneys for the Sierra Club to whom all correspondence and filings in this docket should be addressed is:

Gudrun Thompson
Tirrill Moore
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to gthompson@selcnc.org and tmoore@selcnc.org.

WHEREFORE, the Sierra Club requests that it be allowed to intervene in this docket.

Respectfully submitted this 5th day of August, 2020.

/s Gudrun Thompson
Gudrun Thompson
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gthompson@selcnc.org

Tirrill Moore
N.C. Bar No. 52299
tmoore@selcnc.org

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Attorneys for the Sierra Club

CERTIFICATE OF SERVICE

I certify that all parties of record 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 5th day of August, 2020.

/s Gudrun Thompson