

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1273
DOCKET NO. E-2, SUB 1274
DOCKET NO. E-2, SUB 1275
DOCKET NO. E-2, SUB 1276

DOCKET NO. E-2, SUB 1273)
)
In the Matter of)
Application Pursuant to G.S. 62-133.9)
and Commission Rule R8-69 for)
Approval of Demand-Side)
Management and Energy Efficiency)
Cost Recovery Rider)
)
DOCKET NO. E-2, SUB 1274)
)
In the Matter of)
Application Pursuant to G.S. 62.133.14)
and Commission Rule R8-70 for)
Approval of Joint Agency Asset Rider)
)
DOCKET NO. E-2, SUB 1275) CUCA’S PETITION TO INTERVENE
)
In the Matter of)
Application Pursuant to G.S. 62-110.8)
and Commission Rule R8-71 for)
Approval of CPRE Compliance Report)
and CPRE Cost Recovery Rider)
)
DOCKET NO. E-2, SUB 1276)
)
In the Matter of)
Application of Duke Energy Progress,)
LLC, for Approval of Renewable)
Energy and Energy Efficiency Portfolio)
Standard Cost Recovery Rider Pursuant)
to N.C.G.S. § 62-133.8 and)
Commission Rule R8-67)

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina
Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its

undersigned counsel, hereby respectfully petitions to intervene in the above-captioned dockets. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and addresses of its principal officers are

Chair: David J. Lyons
Gerdau Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Executive Director: Kevin N. Martin
Carolina Utility Customers Association, Inc.
8386 Six Forks Rd, Suite 103
Raleigh, NC 27615
kmartin@cucainc.org

3. CUCA's attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Kevin Martin:

Marcus W. Trathen
Craig D. Schauer
Brooks, Pierce, McLendon,
Humphrey & Leonard, LLP
Suite 1700, Wells Fargo Capitol Center
150 Fayetteville Street
P.O. Box 1800 (zip 27602)
Raleigh, NC 27601
mtrathen@brookspierce.com
cschauer@brookspierce.com

4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke

Energy Progress, LLC (“DEP”) has been authorized by the Commission to sell electricity at retail.

5. CUCA’s member companies use electricity sold by DEP in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies. DEP’s filing will affect the rate associated with DEP’s sale of electricity to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

6. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceedings, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

Respectfully submitted, this 19th day of July, 2021.

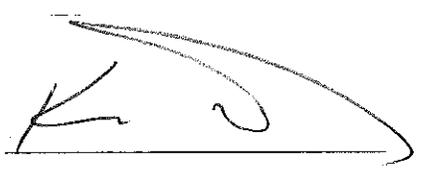
/s/ Craig D. Schauer
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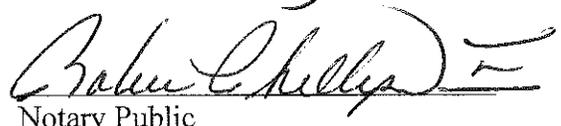
VERIFICATION

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and thing therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Carolina Utility Customers Association, Inc..

This the 16th day of July, 2021.



Sworn to and subscribed before me
this 16th day of July, 2021.


Notary Public

Commission Expires: 12-1-2021

<p>ROBERT PHILLIPS IV Notary Public Wake Co., North Carolina My Commission Expires Dec. 01, 2021</p>

Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in this proceeding by electronic mail.

This the 19th day of July, 2021.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

/s/ Craig D. Schauer