

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-7, SUB 1162

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:  
Duke Energy Carolinas, LLC's Application for  
Approval of REPS Compliance Report and  
Cost Recovery Rider Pursuant to N.C. Gen.  
Stat. 62-133.8 and Commission Rule R8-67

**PETITION TO INTERVENE OF  
RUTHERFORD ELECTRIC  
MEMBERSHIP CORPORATION**

Rutherford Electric Membership Corporation ("Rutherford EMC" or "Petitioner"), by and through undersigned counsel, respectfully requests the North Carolina Utilities Commission (the "Commission") to allow its intervention in this docket pursuant to Section 62-72 of the North Carolina General Statutes and Rules R1-5, R1-6, R1-7, and R1-19 of the Rules and Regulations of the Commission. In support of this Petition, Rutherford EMC shows the Commission as follows:

1. Rutherford EMC is a member-owned, non- profit electric distribution cooperative.

The full name and mailing address of Petitioner is:

Rutherford Electric Membership Corporation  
186 Hudlow Road  
Forest City, North Carolina 28043

2. Rutherford EMC's representatives in this proceeding, to whom all notices, pleadings and other documents related to this proceeding should be directed are as follows:

Ralph McDonald  
[rmcdonald@bdixon.com](mailto:rmcdonald@bdixon.com)  
Warren Hicks  
[whicks@bdixon.com](mailto:whicks@bdixon.com)  
Bailey & Dixon, LLP  
P.O. Box 1351  
Raleigh, North Carolina 27602

Joseph H. Joplin  
Rutherford Electric Membership Corporation  
186 Hudlow Road  
Forest City, North Carolina 28043  
[jjoplin@remc.com](mailto:jjoplin@remc.com)

3. Pursuant to its Power Purchase and REPS Compliance Service Agreement with Duke Energy Carolinas, Rutherford EMC relies upon Duke Energy Carolinas to facilitate its compliance with its renewable energy and efficiency portfolio standard ("REPS") obligations under Session Law 2007-397. Specifically, Duke Energy's 2017 REPS compliance report will cover measures undertaken to meet the Rutherford EMC's REPS requirements.

4. In light of Rutherford EMC's reliance upon Duke Energy to fulfill its REPS compliance obligations, the determination of certain issues in this docket could have a direct effect on Rutherford EMC and its compliance with these requirements; and therefore, Rutherford EMC has a direct, substantial, and pecuniary interest in this proceeding.

5. Pursuant to Rule R1-39, Rutherford EMC agrees to electronic service of all pleadings and other papers in this docket.

WHEREFORE, Petitioner Rutherford Electric Membership Corporation respectfully requests to be allowed to intervene in this docket.

Respectfully submitted: May 21, 2018

BAILEY & DIXON, LLP

By: Warren Hicks  
Ralph McDonald  
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# VERIFICATION

Warren Hicks, first being duly sworn, deposes and says: that she is the attorney for Petitioner Rutherford Electric Membership Corporation; 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 Petitioner.

May 21, 2018.

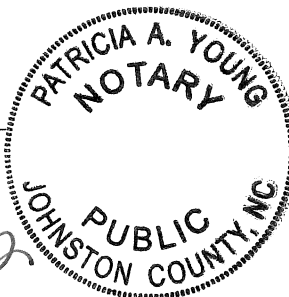
By: Warren Hicks  
Warren Hicks

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and Subscribed before me this the 21<sup>st</sup> day of May, 2017<sup>8 PM</sup>, by Warren Hicks.

Patricia A. Young  
Notary Public

Patricia A. Young  
Typed or Printed Notary Name



My Commission Expires: 10-17-22

## CERTIFICATE OF SERVICE

The undersigned attorney for Petitioner Rutherford Electric Membership Corporation hereby certifies that she served the foregoing Petition to Intervene upon the parties of record in this proceeding by electronic mail.

May 21, 2018.

By: Warren Hicks  
Warren Hicks