

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 179

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
Duke Energy Progress, LLC, and Duke)	
Energy Carolinas, LLC 2022 Biennial)	PETITION TO INTERVENE BY
Integrated Resource Plans and Carbon)	AVANGRID RENEWABLES, LLC
Plan		

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, Avangrid Renewables, LLC (“Avangrid Renewables” or “Petitioner”), petitions the Commission for leave to intervene in this proceeding. In support of its Petition, Avangrid Renewables states the following.

1. Avangrid Renewables, a limited liability company organized under the laws of Oregon, is a development company that develops, owns, and operates renewable energy projects, including wind and solar generation resources. Avangrid Renewables currently owns generation assets in 22 states, including the only major operating wind project in North Carolina – the 208 MW Desert Wind Energy Project, located in northeastern North Carolina.

2. Avangrid Renewables has a direct and substantial interest in the subject matter of this proceeding because the issues under consideration in this proceeding may affect how Avangrid Renewables develops one or more offshore wind projects that could be utilized to help meet the demand for renewable electric power in North Carolina.

3. Avangrid Renewables, through its wholly owned subsidiary Kitty Hawk Wind, LLC (“Kitty Hawk Wind”), holds lease OCS-A 0508 issued by the Bureau of Ocean Energy

Management (“BOEM”), which grants Kitty Hawk Wind the exclusive right to propose one or more offshore wind farms in the lease area located in federal waters off the coast of North Carolina (“Lease Area 0508”). Lease Area 0508 is one of only three existing BOEM offshore wind leases located offshore of the Carolinas. Therefore, Avangrid Renewables has a direct and substantial interest in the development of offshore wind in the region.

4. Through its leasehold interest of Lease Area 0508, Avangrid Renewables is engaged in activities and business operations to develop offshore wind resources to provide energy supply to customers in North Carolina, including potentially within the service territories of Duke Energy Progress (“DEP”) and Duke Energy Carolinas (“DEC”). The development and supply of renewable electric energy on reasonable terms and conditions, including appropriate consideration of environmental and sustainability goals, is critically important to Avangrid Renewables.

5. As one of three leaseholders of offshore wind areas in this region (Duke Energy Renewables Wind, LLC, an affiliate of DEP and DEC, is one of the others), the existing intervenors do not adequately represent the independent interests of Avangrid Renewables; therefore, Avangrid Renewables should be allowed to intervene and participate in this proceeding independently in its own name as a party.

6. Avangrid Renewables’ participation as a party will benefit the Commission by providing it with the views and positions of an independent developer of renewable offshore wind generation resources, which raises unique issues as compared to other types of renewable generation resources.

7. Avangrid Renewables’ principal place of business is located at 2701 NW Vaughn St., Suite 300, Portland, Oregon 97210. All correspondence related to this proceeding should be addressed to counsel:

Todd S. Roessler
Kilpatrick Townsend & Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Email: TRoessler@KilpatrickTownsend.com
Telephone: (919) 420-1700

Joseph S. Dowdy
Kilpatrick Townsend & Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Email: JDowdy@KilpatrickTownsend.com
Telephone: (919) 420-1700

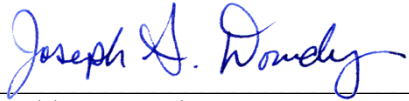
8. Pursuant to Commission Rule R1-39, Avangrid Renewables agrees to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, Avangrid Renewables respectfully requests that the Commission grant Petitioner's request that it be permitted to intervene and participate fully as a party to this docket.

[Signature Page to Follow]

Respectfully submitted this 17th day of June, 2022.

KILPATRICK TOWNSEND & STOCKTON LLP

By: 

Todd S. Roessler

N.C. Bar No. 28046

Joseph S. Dowdy

N.C. State Bar No. 31941

4208 Six Forks Road, Suite 1400

Raleigh, North Carolina 27609

Telephone: (919) 420-1700

Email: TRoessler@KilpatrickTownsend.com
JDowdy@KilpatrickTownsend.com

Attorneys for Avangrid Renewables, LLC

OFFICIAL COPY

JUN 17 2022

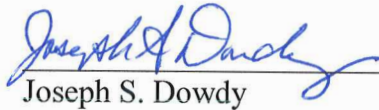
STATE OF NORTH CAROLINA

WAKE COUNTY

VERIFICATION

Joseph S. Dowdy, first being duly sworn, deposes and says that he is the attorney for Avangrid Renewables, LLC; 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 things therein stated on information and belief as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Avangrid Renewables, LLC.

This 14th day of June, 2022.


Joseph S. Dowdy

Sworn to and subscribed before me
this 14th day of June, 2022.


Notary Public (signature)

Susan Y. Barden
Notary Public (printed)

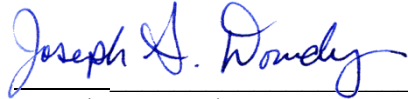
My Commission expires: 9/15/2024



CERTIFICATE OF SERVICE

I certify that a copy of the foregoing *Petition to Intervene by Avangrid Renewables, LLC* has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, first-class postage prepaid, properly addressed to parties of record.

This the 17th day of June, 2022.



Joseph S. Dowdy
Kilpatrick Townsend Stockton LLP
4208 Six Forks Road, Suite 1400
Raleigh, North Carolina 27609
Telephone: (919) 420-1700
JDowdy@KilpatrickTownsend.com