

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1297

In the Matter of:)	
Application of Duke Energy Carolinas, LLC, for a Certificate of Public Convenience and Necessity to Construct an 850 MW Natural Gas-Fired Combustion Turbine Electric Generating Facility in Catawba County, North Carolina)	PETITION TO INTERVENE ON BEHALF OF THE SOUTHERN ALLIANCE FOR CLEAN ENERGY, NATURAL RESOURCES DEFENSE COUNCIL, AND SIERRA CLUB

PURSUANT TO North Carolina Utilities Commission (Commission) Rule R1-19, the Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council (collectively, Petitioners) file this petition to intervene in the above-captioned docket and provide the following information in support of their petition:

1. The Southern Alliance for Clean Energy (SACE) is a regional nonprofit organization whose mission is to promote responsible energy choices to address the impacts of global climate change and ensure clean, safe, and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electric service from Duke Energy Carolinas (DEC) and other utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast’s energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy, and wind energy through education and outreach to improve public health, the environment, and the economy. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842,

Knoxville, TN 37901, and also has offices in North Carolina, South Carolina, Florida, and Georgia.

2. The Natural Resources Defense Council (NRDC) is a national environmental organization with over 30 years' experience working on state energy policy, including utility regulation and energy efficiency. NRDC, and its members in North Carolina who receive electricity service from DEC and other utilities regulated by the Commission, have a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies. NRDC advocates for renewable energy and energy efficiency measures, the implementation of clean energy standards, and the development of other policies and practices that create dramatic energy savings. Likewise, NRDC encourages states to fully account for efficiency potential when they forecast whether they need new power plants or transmission lines to avoid costly infrastructure and to lower customers' bills. NRDC has headquarters at 40 West 20th Street, New York, NY 10011 and also has an office in Asheville, NC.

3. 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 dirty 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 air pollution from fossil-fueled power plants and to promote clean energy sources in North Carolina, and its members include customers

of DEC and other regulated utilities. The address of the Sierra Club's principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601.

4. Petitioners and their members have a direct and substantial interest in the matters at issue in this proceeding, and no other party is capable of adequately representing or protecting their interest. Petitioners, who are dedicated to promoting greater reliance on energy efficiency and renewable energy while reducing greenhouse gas emissions, have serious concerns about DEC's plans to construct a methane gas-fired generating facility. Petitioners' members who receive electric service at their homes and businesses from DEC and other utilities in North Carolina will be affected by the Commission's decision concerning DEC's proposed fossil-fueled resources at issue in this proceeding.

5. Petitioners seek to intervene in this important proceeding concerning DEC's application for a certificate of public convenience and necessity (CPCN) to build a new 850-megawatt natural gas-fired combustion turbine electric generating facility in Catawba County, North Carolina (at the site of its existing Marshall Steam Station). If allowed to intervene, Petitioners would raise their concerns about the CPCN application given North Carolina's carbon-reduction targets and the availability of low-cost renewable energy, energy efficiency, and storage resources.

The attorneys for Petitioners to whom all correspondence and filings in this docket should be addressed are:

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Munashe Magarira
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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: dneal@selcnc.org, mmagarira@selcnc.org, and tgooding@selcnc.org.

WHEREFORE, Petitioners request that they be allowed to intervene in this docket.

Respectfully submitted this the 16th of May 2024.

s/ David Neal
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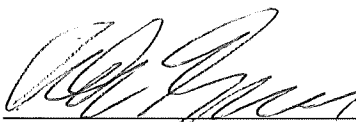
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*Attorneys for Southern Alliance for Clean Energy,
Natural Resources Defense Council, and Sierra
Club*

VERIFICATION

I, Munashe Magarira, verify that the contents of the foregoing Petition to Intervene on behalf of the Southern Alliance for Clean Energy, Natural Resources Defense Council, and Sierra Club are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of the Southern Alliance for Clean Energy, Natural Resources Defense Council, and Sierra Club.

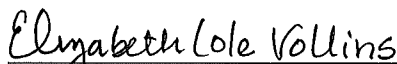
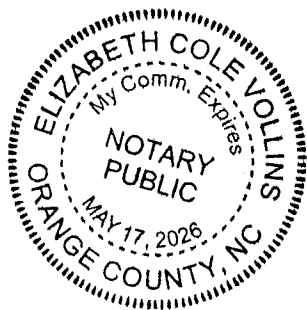


Munashe Magarira
Date: May 16, 2024

Orange County, North Carolina

Sworn to and subscribed before me this day by Munashe Magarira.

This the 16th day of May 2024.



Signature

Elizabeth Cole Vollins, Notary Public

My commission expires: May 17, 2026

CERTIFICATE OF SERVICE

I certify that the parties of record on the service list have been served with this Petition to Intervene on behalf of the Southern Alliance for Clean Energy, Natural Resources Defense Council, and Sierra Club either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 16th day of May 2024.

s/ Munashe Magarira
Munashe Magarira