

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-7, SUB 1264

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Application of Duke Energy Carolinas,  
LLC Pursuant to G.S. 62-133.8 and  
Commission rule R8-67 for Approval of  
REPS Compliance Report and REPS  
Cost Recovery Rider

PETITION TO INTERVENE OF THE  
CAROLINA INDUSTRIAL GROUP FOR  
FAIR UTILITY RATES III (CIGFUR III)

NOW COMES the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III), pursuant to Commission Rules R1-5 and R1-19 and files this petition to intervene in the above-referenced docket. In support of this petition, CIGFUR III respectfully shows as follows:

1. CIGFUR III is an association of purchasers of electric power from Duke Energy Carolinas, LLC (DEC).
2. CIGFUR III's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. All correspondence related to this proceeding should be addressed to:

Christina D. Cress  
Bailey & Dixon, LLP  
434 Fayetteville St., Ste. 2500  
P.O. Box 1351 (zip 27602)  
Raleigh, NC 27601  
(919) 607-6055  
[ccress@bdixon.com](mailto:ccress@bdixon.com)

3. As customers and ratepayers of DEC, the member companies belonging to CIGFUR III have direct, substantial, and pecuniary interest in this proceeding.

4. No other party is capable of adequately representing or protecting CIGFUR III's interests in this proceeding. As such, CIGFUR III should be permitted to intervene and participate as a party to this proceeding.
5. Pursuant to Commission Rule R1-39, CIGFUR III consents to electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR III respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 15th day of March, 2022.


**BAILEY & DIXON, LLP**

/s/ Christina D. Cress  
Christina D. Cress  
N.C. State Bar No. 45963  
434 Fayetteville St., Ste. 2500  
P.O. Box 1351 (zip 27602)  
Raleigh, NC 27601  
(919) 607-6055  
ccress@bdixon.com  
*Attorneys for CIGFUR III*

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR III; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters or 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 CIGFUR III.

This the 15th day of March, 2022.

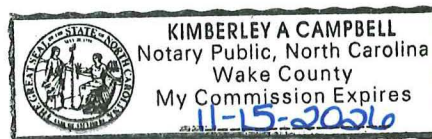
  
Christina D. Cress

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This 15<sup>th</sup> day of March, 2022, by Christina D. Cress.

  
Notary Public



Kimberley A. Campbell  
Typed or Printed Notary Public Name

My Commission Expires: 11-15-2026

**CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR III hereby certifies that she caused the foregoing *Petition to Intervene of the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III)* to be served upon all parties of record to this proceeding by electronic mail.

This the 15th day of March, 2022.

/s/ Christina D. Cress  
Christina D. Cress