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Aug 30 2022

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-22, SUB 644

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application by Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina, for Authority to Adjust its Electric Rates and Charges and Revise its Fuel Factor Pursuant to N.C. Gen. Stat. § 62-133.2 and NCUC Rule R8-55	PETITION TO INTERVENE OF THE CAROLINA INDUSTRIAL GROUP FOR FAIR UTILITY RATES (CIGFUR I)

NOW COMES the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), by and through the undersigned counsel, 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 I respectfully shows as follows:

1. CIGFUR I is an association of purchasers of electric power from Dominion Energy North Carolina (DENC). CIGFUR I's member companies use electric power sold by DENC in the operation of their manufacturing plants.
2. CIGFUR I's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351, and it may be contacted by email through its counsel at ccress@bdixon.com.

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3. CIGFUR I's attorney, to whom all communications and pleadings should be addressed, is shown below:

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

4. As customers and ratepayers of DENC, the member companies belonging to CIGFUR I have direct, substantial, and pecuniary interest in this proceeding.

5. No other party is capable of adequately representing or protecting CIGFUR I's interests in this proceeding. As such, CIGFUR I should be permitted to intervene and participate as a party to this proceeding.

6. Pursuant to Commission Rule R1-39, CIGFUR I consents to electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR I 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 30th day of August, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
Christina D. Cress
N.C. State Bar No. 45963
434 Fayetteville St., Ste. 2500
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(919) 607-6055
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Counsel for CIGFUR I

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VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR I; 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 I.

This the 30th day of August, 2022.

Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 30th day of August, 2022, by Christina D. Cress.

Notary Public

Ellen R. Davis

Typed or Printed Notary Public Name

My Commission Expires: 2/21/2024

ELLEN R. DAVIS
NOTARY
***
PUBLIC
WAKE COUNTY, N.C.

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CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR I hereby certifies that she caused the foregoing *Petition to Intervene* to be served upon all parties of record to this proceeding by electronic mail.

This the 30th day of August, 2022.

/s/ Christina D. Cress
Christina D. Cress