

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 173

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:		
Petition for Investigation Regarding the)	PETITION TO INTERVENE OF
Reliability and Integrity of the Electric Grid in)	CIGFUR I, II, AND III
North Carolina)	

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

1. CIGFUR I is an association of large customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC). CIGFUR I’s mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR I may be contacted by email through its counsel at cress@bdixon.com.

2. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP). CIGFUR II’s mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at cress@bdixon.com.

3. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC). CIGFUR III’s mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR III may be contacted by email through its counsel at cress@bdixon.com.

4. As purchasers of electric power from DENC, the member companies of CIGFUR I have direct, substantial, and pecuniary interests in this proceeding.

5. As purchasers of electric power from DEP, the member companies of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding.

6. As purchasers of electric power from DEC, the member companies of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding.

7. CIGFUR's participation in this docket will bring the important perspective of large, high load-factor industrial customers of DENC, DEP, and DEC, respectively, with regard to the importance of a reliable electric grid and a continuous, uninterrupted electric power supply to the business operations of each CIGFUR member company.

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

Christina D. Cress
434 Fayetteville Street, Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com

9. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

10. Pursuant to Commission Rule R1-39, CIGFUR agrees to electronic service of all pleadings and other papers in this docket.

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

Respectfully submitted this the 6th day of January, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
Christina D. Cress
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Attorneys for CIGFUR

VERIFICATION

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

This the 6th day of January, 2022.

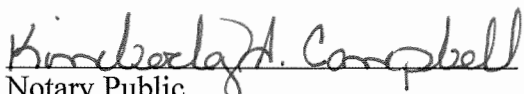


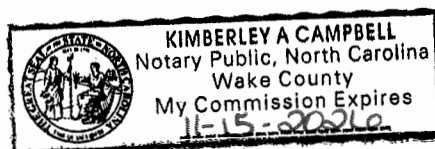
Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

this 6th day of January, 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 hereby certifies that she served the foregoing Petition to Intervene upon the parties of record to this proceeding, as listed on the service list for this docket maintained by the Chief Clerk of the North Carolina Utilities Commission available on the NCUC's online docket system, by electronic mail.

This the 6th day of January, 2022.



Christina D. Cress