

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 192

DOCKET NO. E-100, SUB 192)	
)	
In the Matter of)	CUCA’S PETITION TO INTERVENE
2023 Integrated Resource Plan of)	
Dominion Energy North Carolina)	
)	

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-captioned docket. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and addresses of its principal officers are

Chair: David J. Lyons
Gerda Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Executive Director: Kevin N. Martin
Carolina Utility Customers Association, Inc.
8386 Six Forks Rd, Suite 103
Raleigh, NC 27615
kmartin@cucainc.org

3. CUCA’s attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA’s Executive Director Kevin Martin:

Marcus W. Trathen
Craig D. Schauer
Christopher B. Dodd
Brooks, Pierce, McLendon,
Humphrey & Leonard, LLP
Suite 1700, Wells Fargo Capitol Center
150 Fayetteville Street
P.O. Box 1800 (zip 27602)
Raleigh, NC 27601
mtrathen@brookspierce.com
cschauer@brookspierce.com
cdodd@brookspierce.com

4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Dominion Energy North Carolina (“DENC”) has been authorized by the Commission to sell electricity at retail.

5. A number of CUCA’s member companies use electricity sold by DENC in the operation of their facilities. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies. The issues raised in this docket will affect the rates and availability of electricity to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

6. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

Respectfully submitted, this 8th day of May, 2023.

/s/ Christopher B. Dodd

Marcus W. Trathen

Craig D. Schauer

Christopher B. Dodd

BROOKS, PIERCE, McLENDON,

HUMPHREY & LEONARD, LLP

Suite 1700, Wells Fargo Capitol Center

150 Fayetteville Street

P.O. Box 1800 (zip 27602)

Raleigh, NC 27601

(919) 839-0300, ext. 207 (phone)

(919) 839-0304 (fax)

mtrathen@brookspierce.com

cshauer@brookspierce.com

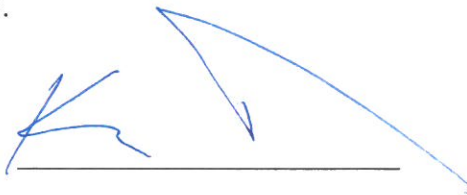
cdodd@brookspierce.com

*Attorneys for Carolina Utility Customers
Association, Inc.*

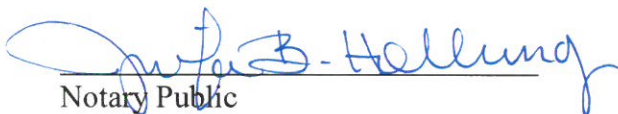
VERIFICATION

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, expect as to any matters and thing therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Carolina Utility Customers Association, Inc..

This the 8 day of May, 2023.



Sworn to and subscribed before me
this 8th day of May, 2023.


Notary Public

Commission Expires:

Jennifer B. Hollerung NOTARY PUBLIC Wake County, NC My Commission Expires June 07, 2026
--

Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in this proceeding by electronic mail.

This the 8th day of May, 2023.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

/s/ Christopher B. Dodd