

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 179

In the Matter of:)
Duke Energy Progress, LLC, and)
Duke Energy Carolinas, LLC, 2022)
Biennial Integrated Resource Plans) **PETITION TO INTERVENE**
and Carbon Plan)
)
)
)

PURSUANT TO Commission Rules R1-5, R1-7, and R1-19, the North Carolina Council of Churches, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. Duke Energy Progress, LLC and Duke Energy Carolinas, LLC have submitted Integrated Resources Plans and Carbon Plans pursuant to orders of the Commission.
2. North Carolina Council of Churches has a membership of 27 distinct judicatories from 18 denominations, roughly 6,200 congregations across the state. In 1968, the Internal Revenue Service determined that the North Carolina Council of Churches is a nonprofit, church organization exempt from taxation. North Carolina Interfaith Power and Light is a project of the North Carolina Council of Churches. Since 2005, NCIPL has been a state affiliate of the national Interfaith Power & Light Campaign. There are now Interfaith Power & Light affiliates in 40 states with over 15,000 engaged congregations.
3. The North Carolina Council of Churches and its members have a direct and substantial interest in this proceeding. Churches who are members of the North Carolina Council of Churches are ratepayers to Duke Energy Progress, LLC and Duke

Energy Carolinas, LLC. Through the North Carolina Interfaith Power and Light project, North Carolina Council of Churches educates and advocates regarding the theological call to care for creation through a number of actions directly implicated by the IRP and the Carbon Plan. These actions include: supporting congregation-level actions reducing energy use through energy efficiency, energy conservation, and use of renewable energy. Through the North Carolina Interfaith Power and Light project, North Carolina Council of Churches educates and advocates for policies and systems to achieve improved spiritual and physical health, justice, peace, and sustainability for future generations when responding creatively to climate change. Plans proposed and established in this proceeding directly impact these missions and programs.

4. The address of the North Carolina Council of Churches is 27 Horne St., Raleigh, NC 27607.

5. The attorney for the North Carolina Council of Churches to whom all correspondence and filings in this docket should be addressed is:

James P. Longest, Jr.
Duke University School of Law
Box 90360
Durham, NC 27708
919-613-7207

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to longest@law.duke.edu.

WHEREFORE, the North Carolina Council of Churches requests that it be allowed to intervene in this docket.

Respectfully submitted this 11th day of July, 2022.

/s James P. Longest, Jr.
N.C. Bar No. 18297

Duke University School of Law
Box 90360
Durham, NC 27708
919-613-7207
*Attorney for the North Carolina Council of
Churches*

CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 11th day of July 2022.

/s James P. Longest, Jr.

VERIFICATION

I, Susannah Tuttle, verify that the contents of the foregoing Petition to Intervene 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 North Carolina Council of Churches.

Susannah Tuttle
Susannah Tuttle

Date: 7/11/22

Orange County, North Carolina

Sworn to and subscribed before me this day by Susannah Tuttle.

This the 11 day of JULY, 2022

Kyle F Hoopes
Signature

Kyle F Hoopes, Notary Public



My commission expires: JANUARY 27, 2023