

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. G-5, SUB 642

In the Matter of:	)	
Application of Public Service	)	
Company of North Carolina, Inc. for	)	
Annual Review of Gas Costs	)	<b>PETITION TO INTERVENE</b>
Pursuant to N.C. Gen. Stat. § 62-	)	
133.4 and Commission Rule R1-	)	
17(k)(6)	)	

PURSUANT TO Commission Rules R1-19 and R1-17(k)(6)(e), the Haw River Assembly, through counsel, file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. N.C. Gen. Stat. § 62-133.4(c) provides that the Commission shall conduct an annual review to compare each natural gas local distribution company's prudently incurred gas costs with costs recovered from the utility's customers. On June 1, 2022, Public Service Company of North Carolina, Inc. (PSCN) filed its application for review of gas costs.

2. The Haw River Assembly is a 501(c)(3) non-profit citizens' group founded in 1982 to restore and protect the Haw River and Jordan Lake, and to build a watershed community that shares this vision. The Haw River Assembly is dedicated to the goal of environmental justice and equality for all people in our watershed.

3. The Haw River Assembly and its members have a direct and substantial interest in this proceeding. Haw River Assembly has over 1,000

members, some of whom are customers of PSNC and are therefore subject to the direct impacts of PSNC's fuel cost adjustments. PSNC's service territory in the central piedmont overlaps with a significant portion of the Haw River watershed, including Caswell, Alamance, Orange, Chatham, Durham, and western Wake Counties. Haw River Assembly is also interested in ensuring that PSNC's operations and potential capacity expansions do not harm sensitive ecological habitats in the Haw River watershed. Haw River Assembly seeks to intervene in this proceeding in order to ensure that its interests and its members' interests are protected.

4. The mailing address of the Haw River Assembly's principal office is PO Box 187, Bynum, North Carolina 27228. The attorney for the Haw River Assembly to whom all correspondence and filings in this docket should be addressed are:

David Neal  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516  
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to: dneal@selcnc.org.

WHEREFORE, the Haw River Assembly requests that it be allowed to intervene in this docket.

Respectfully submitted this the 8<sup>th</sup> day of July, 2022.

s/ David Neal

David Neal

N.C. Bar No. 27992

dneal@selcnc.org

Southern Environmental Law Center

601 West Rosemary Street, Suite 220

Chapel Hill, NC 27516

Telephone: (919) 967-1450

Fax: (919) 929-9421

*Attorney for Haw River Assembly*

VERIFICATION

I, David Neal, 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 Haw River Assembly.

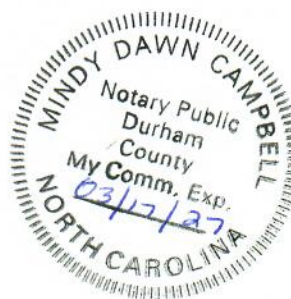


David L. Neal

Date: July 8, 2022

Durham Co., North Carolina

Sworn to and subscribed before me this day by David Neal

This the 8 day of July, 2022  
SignatureMindy D. Campbell, Notary PublicMy commission expires: march 17, 2027

CERTIFICATE OF SERVICE

I certify that the parties of record on the service list have been served with the Petition to Intervene by the Haw River Assembly either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 8<sup>th</sup> day of July, 2022.

s/ David L. Neal  
David L. Neal