

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application by Duke Energy Carolinas, LLC and)	<u>PETITION TO INTERVENE</u> <u>OF SIERRA CLUB</u>
Duke Energy Progress, LLC for Approval)	
of Proposed Electric Transportation Pilot)	

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7 and R1-19, Sierra Club, through counsel, hereby petitions to intervene and participate in the above-captioned proceedings. In support of this petition, Sierra Club states as follows:

1. On March 29, 2019, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (together, the “Companies”) filed an application with the North Carolina Utilities Commission (“Commission”) seeking approval of a proposed electric transportation pilot.

2. Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth’s ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, Sierra Club works to accelerate the transition from fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has begun work to promote a widespread shift to plug-in electric vehicles and

to ensure that the benefits of a twenty-first-century clean transportation system are enjoyed equitably.

3. Sierra Club has a long history of working to reduce air pollution and to promote clean energy sources in the Carolinas. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, docket nos. E-100, sub 157, E-2, sub 1142, E-7, sub 1146, and E-7, sub 1134. In addition, Sierra Club submitted comments on the Companies' application to the South Carolina Public Service Commission for approval of proposed electric transportation pilots—docket nos. 2018-321-E and 2018-322-E. Sierra Club members include customers of the Companies who will be affected by decisions made in this proceeding regarding electric transportation program design, availability, and cost recovery.

4. Sierra Club and its members have direct and substantial interests that will be affected by the decisions made in this proceeding regarding the electric transportation pilot program design, availability, and cost recovery, and their interests cannot be adequately addressed by any other party. Sierra Club's position in this proceeding is to support well-designed electric transportation programs that will result in a shift to electric vehicle use, reduce pollution, and result in cleaner, safer, and healthier communities for all North Carolinians. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

5. The Companies' request implicates Sierra Club's organizational mission and interests. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Companies will be affected by the decisions of the Commission in this and future related proceedings.

6. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Companies' request.

7. The address of the Sierra Club's principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601.

8. The attorneys for Sierra Club to whom all correspondence and filings in this docket should be addressed are:

Matthew D. Quinn
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
Raleigh, NC 27612
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9. The above counsel for Sierra Club, pursuant to Commission Rule R1-39, agree to electronic service of all pleadings and other filings in this matter.

WHEREFORE, Sierra Club requests that they be allowed to intervene in this matter.

Respectfully submitted this 15 day of April, 2019.



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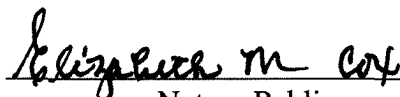
VERIFICATION

I, Matthew D. Quinn, verify that the contents of the foregoing *Petition to Intervene* by *Sierra Club* 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 Sierra Club.

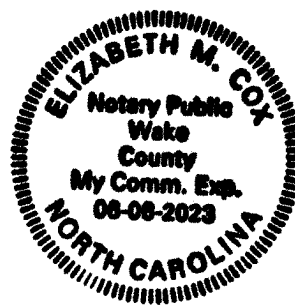

MATTHEW D. QUINN

Sworn to and subscribe before me this

the 15th day of April, 2019.


Notary Public

Commission expires: June 6, 2023



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Petition to Intervene by Sierra Club* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 15 day of April, 2019.



Matthew D. Quinn