

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**DOCKET NO. E-2, Sub 1315****DOCKET NO. E-7, Sub 1288**

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|-------------------------------------|---|---------------------------------|
| In the Matter of: |) | PETITION TO INTERVENE OF |
| Petition of Duke Energy |) | SOUTHERN ALLIANCE FOR |
| Progress, LLC, and Duke |) | CLEAN ENERGY |
| Energy Carolinas, LLC, |) | |
| Requesting Approval of Clean |) | |
| Energy Impact Program |) | |

PURSUANT TO North Carolina Utilities Commission (Commission) Rules R1-5, R1-7, and R1-19, and the Commission's February 9, 2023 *Order Requesting Comments*, the Southern Alliance for Clean Energy (SACE) submits this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. SACE is a regional nonprofit organization whose mission is to promote responsible and equitable energy choices to address the impacts of global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electricity service from utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast's energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy and wind energy

through education and outreach in order to improve public health, the environment and the economy. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, TN 37901, and also has offices in North Carolina, South Carolina, Florida and Georgia.

2. SACE and its members have a direct and substantial interest in the operations of North Carolina electric utilities. SACE and its members are interested in promoting greater reliance on energy efficiency and renewable energy and reducing carbon dioxide emissions by electric utilities in North Carolina. Moreover, SACE's members who receive electricity service at their homes and businesses from the utilities operating in our state will be affected by the customer renewable energy programs developed by the utilities, including the proposed Clean Energy Impact Program—and by the Commission in this and future related proceedings, such as new plant certifications and rate cases.

3. SACE seeks to intervene in order to participate in this important proceeding concerning the provision of electricity in our state. SACE previously intervened and actively participated in the proceeding on the Green Source Advantage program, docket Nos. E-2, Sub 1170 and E-7, Sub 1169. If allowed to intervene, SACE will advocate for robust customer programs that will complement the Initial Carbon Plan and future Carbon Plans.

4. The attorney for SACE to whom all correspondence and filings in this docket should be addressed is:

Nicholas Jimenez
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

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

WHEREFORE, SACE prays that it be allowed to intervene in this matter.

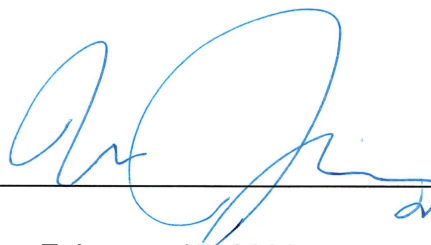
Respectfully submitted this 15th day of February, 2023.

s/ Nick Jimenez
Nicholas Jimenez
N.C. Bar No. 53708
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CENTER
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*Attorney for Southern Alliance for Clean
Energy*

VERIFICATION

I, Nicholas Jimenez, 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 Southern Alliance for Clean Energy.

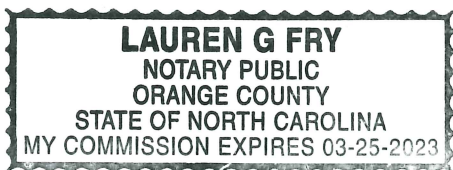


Date: February 15, 2023

Orange County, North Carolina

Sworn to and subscribed before me this day by Lauren G. Fry.

This 15th day of February, 2023.


Signature

Lauren G. Fry, Notary Public

My commission expires: March 25, 2023

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene of Southern Alliance for Clean Energy as filed today in Docket Nos. E-2, Sub 1315 and E-7, Sub 1288 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 15th day of February, 2023.

s/ Nick Jimenez