## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 1159 DOCKET NO. E-7, SUB 1156

#### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC, Joint Petition for Approval of Competitive Procurement of Renewable Energy Program

# PETITION TO INTERVENE OF CIGFUR II AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together with CIGFUR II, CIGFUR), pursuant to Commission Rules R1-5 and R1-19, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

- CIGFUR II is an association of non-residential retail customers of Duke Energy Progress, LLC (DEP).
- 2. CIGFUR III is an association of non-residential retail customers of Duke Energy Carolinas, LLC (DEC) (together with DEP, Duke Energy).
- 3. As ratepayers and purchasers of electric power from Duke Energy, CIGFUR's member companies have direct, substantial, and pecuniary interests in this proceeding.
- CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at <a href="mailto:ccress@bdixon.com">ccress@bdixon.com</a>.

- 5. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding.
- 6. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress
Douglas E. Conant
Bailey & Dixon, LLP
434 Fayetteville Street, Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com
dconant@bdixon.com

7. Pursuant to Commission Rule R1-39, CIGFUR agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 6th day of October, 2023.

#### **BAILEY & DIXON, LLP**

/s/ Douglas E. Conant
Christina D. Cress
N.C. State Bar No. 45963
Douglas E. Conant
N.C. State Bar No. 60115
434 Fayetteville St., Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com
dconant@bdixon.com
Attorneys for CIGFUR

#### **VERIFICATION**

Douglas E. Conant, first being duly sworn, deposes and says as follows: that he is one of the attorneys for CIGFUR; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters or things 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 CIGFUR.

This the 6th day of October, 2023.

Douglas E. Conant

STATE OF NORTH CAROLINA COUNTY OF WAKE

Sworn to and subscribed before me,

this the 6th day of October 2023, by Douglas E. Conant.

Notary Public

Typed or Printed Notary Public Name

HARACIO COUNTY

My Commission Expires: 10/1/2024

### **CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR hereby certifies that he caused the foregoing *Petition to Intervene of CIGFUR II & III* to be served upon all parties of record to this proceeding, as set forth in the Service List maintained by the Chief Clerk of the NCUC, by electronic mail.

This the 6th day of October, 2023.

/s/ Douglas E. Conant Douglas E. Conant