

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 179

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Duke Energy Progress, LLC, and Duke	)	PETITION TO INTERVENE
Energy Progress, LLC, 2022 Biennial	)	OF RWE OFFSHORE WIND
Integrated Resource Plans and Carbon Plan	)	HOLDINGS, LLC

Pursuant to Rules R1-5, R1-7 and R1-15 of the Rules and Regulations of the North Carolina Utilities Commission, RWE Offshore Wind Holdings, LLC ("RWE"), by and through its undersigned counsel, respectfully petitions to intervene as a party in the above-captioned proceeding and to participate as such in this proceeding. In support of its petition, RWE states:

1. RWE Offshore Wind Holdings, LLC is a limited liability company organized under the laws of the State of Delaware, doing business since on or about August 1, 2016. Its principal place of business is 353 North Clark Street, 30<sup>th</sup> Floor, in Chicago, Illinois 60610.
2. RWE is a development entity that develops, owns, and operates renewable power projects, particularly offshore wind generation resources. RWE and its affiliates deliver renewable energy from various technologies to focus on energy reliability, energy security, energy affordability, and climate change, serving customers throughout the United States and in other countries.
3. In connection with auctions of offshore areas near North Carolina, RWE is engaged in activities and business operations directed towards development of

offshore wind resources to provide energy supply to customers within the service territories of Duke Energy Progress (“DEP”) and Duke Energy Carolinas (“DEC”) inside North Carolina, and also operations in states or offshore regions near North Carolina that may become the site for wind resources for serving customers residing within the retail service territories of those affiliated public utilities. The development and supply of renewable electric energy on reasonable terms and conditions, including appropriate consideration of environmental goals such as decarbonization, is critically important to these business operations of RWE and the business functions supported by such operations.

4. The proposed carbon plan(s) of DEC and DEP, which are being jointly developed and are likely to be jointly implemented, will have a direct and substantial impact on the business operations and plans being undertaken by RWE. The existing intervenors do not adequately represent the independent interests of RWE, and thus RWE should be allowed to intervene and participate in this proceeding independently in its own name as a party.
5. RWE’s participation as a party will likely benefit the Commission by providing it with the views and positions of an independent developer of renewable wind generation resources, as compared to other types of renewable generation resources.
6. All correspondence related to this proceeding should be addressed to RWE’s counsel as follows:

Joseph W. Eason, Esq.  
N.C. Bar No. 7699  
joe.eason@nelsonmullins.com  
Nelson, Mullins, Riley & Scarborough LLP  
4140 Parklake Ave., Suite 200  
Raleigh, NC 27612  
DID: (919) 329-3807  
Fax: (919) 329-3799

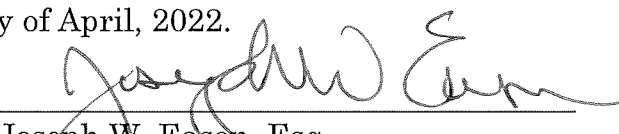
And to:

Weston Adams, Esq.  
N.C. Bar No. 18659  
weston.adams@nelsonmullins.com  
Nelson, Mullins, Riley & Scarborough LLP  
Suite 1700  
1320 Main Street  
Columbia, SC 29201  
DID: (803) 799-2000  
Fax: (803) 256-7500

7. Pursuant to Commission Rule R1-39, RWE agrees through its undersigned counsel to accept electronic service of all pleadings and other filings in this proceeding.

WHEREFORE, RWE respectfully requests that the Commission enter an order allowing it to intervene in the above-captioned proceeding as a party with all rights attendant thereto, including the right to discovery and to otherwise exercise all statutory rights provided to intervenors under North Carolina law.

Respectfully submitted, this 14<sup>th</sup> day of April, 2022.

  
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Joseph W. Eason, Esq.  
N.C. Bar No. 7699

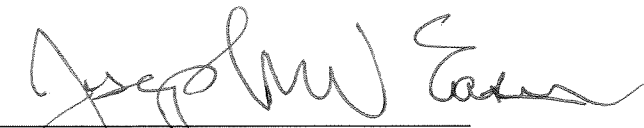
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Raleigh, N.C. 27612  
DID: (919) 329-3807  
Fax: (919) 329-3799

Weston Adams, by JWE  
Weston Adams, Esq.  
N.C. Bar No. 18659  
Weston.adams@nelsonmullins.com  
Nelson, Mullins, Riley & Scarborough LLP  
Suite 1700  
1320 Main Street  
Columbia, SC 29201  
DID:(803)799-2000  
Fax:(803) 256-7500

VERIFICATION

Joseph W. Eason, first being duly sworn, deposes and says that he is the attorney for RWE Offshore Wind Holdings, LLC; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of RWE Offshore Wind Holdings, LLC.

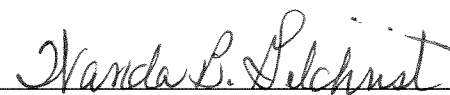
This 14<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
Joseph W. Eason

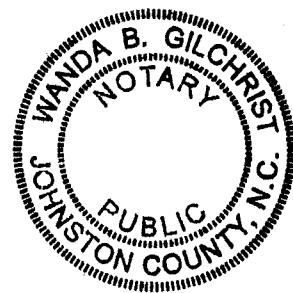
North Carolina

Wake County

Sworn to and subscribed before me this 14<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
Notary Public


*My commission expires*  
*2-24-2023*



## CERTIFICATE OF SERVICE

The undersigned attorney for RWE Renewables Americas, LLC, hereby certifies that he served the foregoing Petition to Intervene upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

This 14<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
Joseph W. Eason