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March 17, 2023

Via Electronic Submittal

Ms. A. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

**Re: In the Matter of  
Duke Energy Progress, LLC's Application to Adjust Retail Base Rates and  
for Performance-Based Regulation, and Request for an Accounting Order  
Docket No. E-2, Sub 1300  
*North Carolina League of Municipalities' Verified Petition to Intervene***

Dear Ms. Dunston:

On behalf of North Carolina League of Municipalities ("NCLM"), we herewith electronically submit NCLM's Verified Petition to Intervene in the above referenced docket.

If you should have any questions concerning this filing, please let me know.

Thank you and your staff for your assistance.

Sincerely,

*/s/ Benjamin L. Snowden*

Benjamin L. Snowden  
Attorney for North Carolina League of  
Municipalities

pbb  
Enclosure

cc: Parties and Counsel of Record  
NC Public Staff

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. E-2, SUB 1300**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:	)	<b>VERIFIED PETITION</b>
Duke Energy Progress, LLC's	)	<b>TO INTERVENE</b>
Application to Adjust Retail Base Rates	)	<b>BY</b>
and for Performance-Based Regulation,	)	<b>NORTH CAROLINA LEAGUE</b>
and Request for an Accounting Order	)	<b>OF MUNICIPALITIES</b>

NOW COMES the North Carolina League of Municipalities ("Petitioner"), by and through its undersigned counsel, and respectfully requests that the North Carolina Utilities Commission (the "Commission") allow it to intervene in the above-referenced docket pursuant to Rules R1-5 and R1-19 of the Rules and Regulations of the Commission and to grant it leave to participate fully as a party in this docket. In support of this Petition, Petitioner shows the Commission the following:

1. Petitioner's name and mailing address where notices should be sent is:

North Carolina League of Municipalities  
c/o Rose Vaughn Williams  
434 Fayetteville St., Suite 1900  
Raleigh, NC 27601  
Telephone: 919-715-2911  
E-mail: [rwilliams@nclm.org](mailto:rwilliams@nclm.org)

2. Counsel for Petitioner is:

Ben Snowden  
Fox Rothschild LLP  
434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Telephone: 919-719-1257  
E-mail: [bsnowden@foxrothschild.com](mailto:bsnowden@foxrothschild.com)

3. Petitioner is a nonpartisan membership association of more than 540 cities, towns, villages, public authorities, and special districts in North Carolina. Petitioner's primary purposes include advocating for municipalities at the state and federal level, providing a forum for the exchange of ideas among municipal officials, promoting excellence and efficiency in municipal government, and providing services and information that will help municipal officials meet the needs of their citizens.

4. Among the services provided to its members, Petitioner routinely represents municipal views in state regulatory processes, such as this proceeding before the Commission.

5. Petitioner's members include cities, towns, villages, public authorities, and special districts that are located in the service territory of Duke Energy Progress, LLC ("DEP") and are retail customers of DEP. These members use electric power supplied by DEP to provide electricity for street lighting, traffic signalization, water and wastewater treatment facilities, recreational facilities, and/or municipal buildings and operations. Petitioner has a strong interest in DEP's request for an increase in its rates and charges for electricity.

6. As this proceeding will have a direct financial impact on Petitioner's member municipalities, public authorities, and special districts, Petitioner has a valid and direct interest in this proceeding. No other party can adequately represent Petitioner's interests in this docket.

7. Petitioner's participation in this docket will bring critical insight, knowledge, and understanding of the issues in this docket.

8. Petitioner agrees to accept electronic service of all filings in this docket.

9. Petitioner asks that the Commission make it a party to this proceeding with the right to call witnesses, cross-examine other parties' witnesses, and be heard on all matters relative to the issues involved.

WHEREFORE, Petitioner respectfully requests that the Commission enter an Order allowing Petitioner to intervene and participate fully as a party in this docket.

This 17<sup>th</sup> day of March, 2023.

FOX ROTHSCHILD, LLP

By: /s/ Benjamin L. Snowden

Benjamin L. Snowden  
Fox Rothschild LLP  
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NORTH CAROLINA

## VERIFICATION

WAKE COUNTY

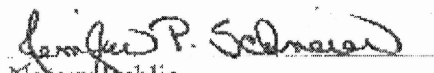
The undersigned, being first duly sworn, deposes and says that she is Executive Director for the North Carolina League of Municipalities; that she has read the foregoing Petition to Intervene; that to her personal knowledge, the matters and statements contained therein are true, except as to those matters or statements made upon information and belief, and as to those she believes them to be true; and that she is authorized to sign this verification on behalf of the Petitioner.

This 17 day of March, 2023.

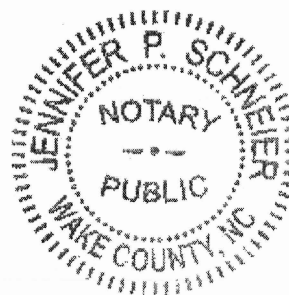
  
Rose Vaughn Williams

Sworn to and subscribed before me

this 17<sup>th</sup> day of March, 2023.

  
Notary Public

My Commission Expires: April 24, 2021



**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing Petition to Intervene by the North Carolina League of Municipalities has been served this day upon each of the parties of record in this proceeding or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 17th day of March, 2023.

By: /s/ Benjamin L. Snowden

Benjamin L. Snowden  
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Mar 17 2023