

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. G-9, SUB 837

In the Matter of  
Application of Piedmont Natural Gas )  
Company, Inc. for an Adjustment of )  
Rates, Charges, and Tariffs Applicable )  
to Service in North Carolina, )  
Continuation of its IMR Mechanism, ) **CUCA’S PETITION TO INTERVENE**  
Adoption of New Depreciation Rates for )  
its Utility Property, Regulatory Asset )  
Accounting Treatment for Certain )  
Operating Expenses, and Other Relief )

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-captioned dockets. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and address of its principal officer are:

Kevin N. Martin  
Executive Director  
Carolina Utility Customers Association, Inc.  
8386 Six Forks Rd, Suite 103  
Raleigh, NC 27615  
kmartin@cucainc.org

3. CUCA’s attorneys, to whom all communications and pleadings should be addressed, are shown below.

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4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Piedmont Natural Gas Company, Inc. (“PNG”) has been authorized by the Commission to sell natural gas at retail.

5. CUCA’s member companies use natural gas sold by PNG in the operation of their manufacturing plants. The availability of an adequate supply of natural gas at a reasonable price is critical to the economic viability of CUCA’s member companies.

6. The issues raised in the above-captioned docket will affect the rates and availability of natural gas to CUCA members. As ratepayers and purchasers of natural gas from PNG, CUCA has a vital interest in the matters at issue in the above-captioned proceedings and should be permitted to intervene and participate.

7. No other party is capable of adequately representing CUCA’s interests in these proceedings.

8. Pursuant to Commission Rule R1-39, CUCA agrees to accept electronic service of all filings in these proceedings.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceedings,

including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

Respectfully submitted, this 11th day of April, 2024.

/s/ Christopher B. Dodd

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*Attorneys for Carolina Utility Customers  
Association, Inc.*

**VERIFICATION**

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; 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 thing 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 Carolina Utility Customers Association, Inc..

This the 11 day of April, 2024.



Sworn to and subscribed before me  
this 11 day of April, 2024.

Sandra R. AHR  
Notary Public

Commission Expires: 16 November 2029



**Certificate of Service**

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in these proceedings by electronic mail.

This the 11th day of April, 2024.

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, LLP

/s/ Christopher B. Dodd