

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-2, SUB 1318

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Notification of Preliminary Plans to  
Construct an Electric Generating  
Facility in Person County, North  
Carolina

PETITION TO INTERVENE OF  
CIGFUR II

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II or 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:

1. CIGFUR II is an association of non-residential retail customers of Duke Energy Progress, LLC (DEP).
2. As ratepayers and purchasers of electric power from Duke Energy, CIGFUR's member companies have direct, substantial, and pecuniary interests in this proceeding.
3. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at [ccress@bdixon.com](mailto:ccress@bdixon.com).
4. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding.
5. 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](mailto:ccress@bdixon.com)  
[dconant@bdixon.com](mailto:dconant@bdixon.com)

6. 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 18th day of March, 2024.

**BAILEY & DIXON, LLP**

/s/ Douglas E. Conant  
Christina D. Cress  
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*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 18<sup>th</sup> day of March, 2024.



Douglas E. Conant

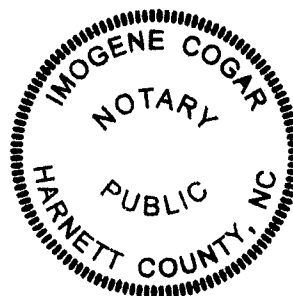
STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This the 18<sup>th</sup> day of March 2024, by Douglas E. Conant.

  
Notary Public

IMOGENE COGAR  
Typed or Printed Notary Public Name



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* 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 18th day of March, 2024.

/s/ Douglas E. Conant  
Douglas E. Conant