

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 173

In the Matter of
Petition for Investigation Regarding the Reliability and Integrity of the Electric Grid in North Carolina)
CUCA’S PETITION TO INTERVENE)

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 docket. 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 addresses of its principal officers are

Chair: David J. Lyons
Gerdau Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Executive Director: Kevin N. Martin
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. Copies of all communications and pleadings should also be served on CUCA’s Executive Director Kevin Martin:

Marcus W. Trathen
Craig D. Schauer
Brooks, Pierce, McLendon,
Humphrey & Leonard, LLP
Suite 1700, Wells Fargo Capitol Center
150 Fayetteville Street
P.O. Box 1800 (zip 27602)
Raleigh, NC 27601
mtrathen@brookspierce.com
cschauer@brookspierce.com

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 territories in which Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Dominion Energy North Carolina (the “Public Utilities”) have been authorized by the Commission to sell electricity at retail.

5. CUCA’s member companies use electricity sold by the Public Utilities in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies. The reliability and integrity of the electric grid operated by the Public Utilities is essential to CUCA members’ access to electricity. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

6. CUCA agrees to accept electronic service of all filings in the Docket.

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 Intervenors under North Carolina law.

Respectfully submitted, this 18th day of January, 2022.

/s/ Craig D. Schauer

Marcus W. Trathen

Craig Schauer

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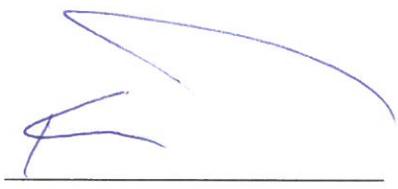
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*Attorneys for Carolina Utility Customers
Association, Inc.*

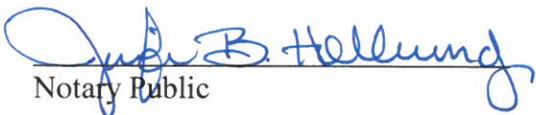
VERIFICATION

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 18 day of January, 2022.



Sworn to and subscribed before me
this 18th day of January, 2022.


Notary Public

Commission Expires: June 7, 2026

Jennifer B. Hollerung
NOTARY PUBLIC
Wake County, NC
My Commission Expires June 07, 2026

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 this proceeding by electronic mail.

This the 18th day of January, 2022.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

/s/ Craig D. Schauer