

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-2, SUB 1300

In the Matter of:	)	
Application of Duke Energy Progress,	)	PETITION TO INTERVENE
LLC for Adjustment of Rates and Charges	)	BY
Applicable to Electric Service in North	)	THE SIERRA CLUB
Carolina and Performance Based Regulation)	)	

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the Sierra Club, through undersigned counsel, hereby petitions to intervene and participate in the above-captioned docket. In support of this petition, the Sierra Club states as follows:

1. The Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth’s ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club works to accelerate the transition from dirty fuels like coal and gas to clean energy solutions like solar, wind, and energy efficiency, and advocates for state and federal policies and industry action to achieve this transition. The Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in North Carolina, and its members include customers of our state’s regulated electric utilities.

2. The Sierra Club and its more than 19,200 North Carolina members—many of whom are customers of Duke Energy Progress, LLC (the “Company”)—have a direct

and substantial interest in this proceeding. The Company has sought to increase its retail electric base rates and charges and seeks to justify the requested increase by identifying costs incurred in connection with capital expenditures intended to modernize the grid and transition the Company to a cleaner energy future, among other things. In addition, the Company is requesting approval of performance-based regulation, which includes a proposed multiyear rate plan with base rate increases over time. The Company's request implicates Sierra Club's organizational mission and interests. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings.

3. The Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Company's request for a rate increase, its proposed capital investments and project portfolios, and related changes to the existing rate structure.

4. The address of the Sierra Club Chapter in Raleigh, North Carolina is P.O. Box 30396, Raleigh, NC 27622-0396.

5. The attorneys for the Sierra Club to whom all correspondence and filings in this docket should be addressed are:

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\*pro hac vice admission pending

6. The above counsel for the Sierra Club, pursuant to Commission Rule RI-39, agree to electronic service of all pleadings and other filings in this matter.

WHEREFORE, the Sierra Club requests that they be allowed to intervene in this matter.


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

/s/ Catherine Cralle Jones  
Catherine Cralle Jones  
N.C. State Bar No. 23733  
Andrea C. Bonvecchio  
N.C. State Bar No. 56502  
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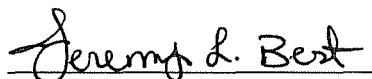
*Counsel for the Sierra Club*

VERIFICATION

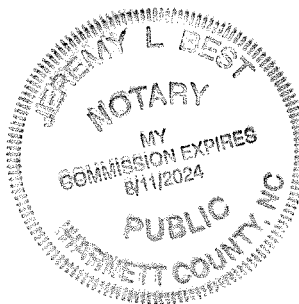
I, Catherine Cralle Jones, verify that the contents of the foregoing *Petition to Intervene by the Sierra Club* are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf the Sierra Club.

  
CATHERINE CRALLE JONES

Sworn to and subscribe before me  
This the 14<sup>th</sup> day of December, 2022

  
Notary Public

Commission expires: 8/11/2024



CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing *Petition to Intervene by the Sierra Club* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

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

LAW OFFICES OF F. BRYAN BRICE, JR.

By: /s/ Catherine Cralle Jones  
Catherine Cralle Jones