

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. E-100, SUB 165**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of:  
2020 Biennial Integrated Resource Plans and  
Related 2020 REPS Compliance Plans

**PETITION TO INTERVENE BY  
NORTH CAROLINA CLEAN  
ENERGY BUSINESS ALLIANCE**

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Clean Energy Business Alliance (“NCCEBA” or “Petitioner”), petitions the Commission for leave to intervene in this proceeding. In support of its Petition, NCCEBA states the following.

1. NCCEBA is a non-profit trade association created to promote the common interests of clean energy businesses in North Carolina. It is comprised of and represents all types of businesses in the clean energy sector including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy.

2. Many of NCCEBA's members are customers of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, and are proponents of renewables-based generation and energy efficiency. Many of NCCEBA’s members file applications for certificates of public convenience and necessity for their solar facilities and enter into purchase power agreements with Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (together, “Duke Energy”).

3. NCCEBA has an interest in the subject matter of this proceeding. The 2020 Biennial Integrated Resource Plans (“IRP”) for Duke Energy will have significant implications for the energy policy landscape in North Carolina. NCCEBA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding, and no other party will be able to represent NCCEBA’s interest in this proceeding.

4. All correspondence related to this proceeding should be addressed to

Karen M. Kemerait  
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Christopher M. Carmody  
Executive Director  
North Carolina Clean Energy Business Alliance  
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5. Pursuant to Commission Rule R1-39, NCCEBA agrees to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, NCCEBA respectfully requests that the Commission grant Petitioner’s request that it be permitted to intervene and participate fully as a party to this docket.

Respectfully submitted this 5th day of October, 2020.

FOX ROTHSCHILD LLP

BY: *Karen M. Kemerait*

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STATE OF NORTH CAROLINA

DURHAM COUNTY

VERIFICATION

I, Christopher M. Carmody, being first duly sworn, depose and say that I am the Executive Director for North Carolina Clean Energy Business Alliance, and do hereby declare that I am duly authorized to act on behalf of the Petitioner, that I have read the foregoing Petition to Intervene, and that the same is true and accurate to my personal knowledge and belief.

This 30<sup>th</sup> day of September, 2020.

  
\_\_\_\_\_  
Christopher M. Carmody  
North Carolina Clean Energy Business Alliance

Sworn to and subscribed before me  
this 30<sup>th</sup> day of ~~August~~ September, 2020.

Victoria L Miller  
Notary Public (signature)

Victoria L Miller  
Notary Public (printed)

My Commission expires: 9-23-2022

[Notary Seal]



## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Petition to Intervene has been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

This the 5th day of October, 2020.

/s/ Karen M. Kemerait  
Karen M. Kemerait  
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434 Fayetteville St., Suite 2800  
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