

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. EMP-93, SUB 0**

In the Matter of: Application for CPCN to Construct a 74 MW Electric Merchant Plant and Registration of Facility Located at Terra Ceia Rd., Beaufort, NC	PETITION OF MARSHALL AND JOANN LILLEY TO INTERVENE
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PETITION OF MARSHALL AND JOANN LILLEY TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rule R1-19, I, Marshall and Joann Lilley hereby petition to intervene in the above-referenced docket. In support of this petition, I state as follows:

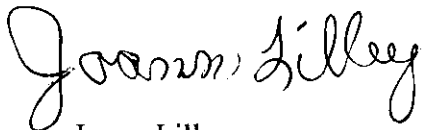
1. I am the willed home owner and land owner in the Terra Ceia Community, where the proposed utility scale solar electric merchant plant, as amended, will have direct negative impacts. My property is adjacent to the amended plans.
2. The solar facility will lower the value of my property.
3. The low-lying elevation creates the following potential hazards:
 - a. Surface water contamination
 - b. Ground water contamination due to high water table thus affecting water wells and drinking water
 - c. Electrical hazards for the nearby neighbors, and churches
4. The panels may become dislodged or separate during high wind events and become hazardous.

5. The lithium-ion battery storage facility is located close to homes and a road traveled by many citizens daily. This represents a particular fire hazard to this area, including my home, due to the composition of the soil. The soil is combustible.
6. I seek for the Commission to deny the application for a CPCN for the proposed 74 MW solar electric merchant plant located at Terra Ceia Rd in Beaufort County, North Carolina.
7. All correspondence related to this proceeding should be addressed to:

Marshall and Joann Lilley
1001 Free Union Church Rd Pinetown, NC 27865
pltsinc@gotricounty.com
8. I agree to electronic service of all pleadings and other filings in this matter.
9. I certify that I have electronically copied the persons on the docket service list - Henry Campen, Merrick Parrott, Dianna Downey, and David Butcher.

WHEREFORE, for the reasons set forth above, I respectfully ask that I be allowed to intervene in this matter.

Respectfully submitted,


Joann Lilley


Marshall Lilley