

DOCKET NO. E-100, SUB 190**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 190****In the Matter of: Duke Energy Progress, LLC)****And Duke Energy Carolinas, LLC, 2024)****Biennial Integrated Resource Plans and)****Carbon Plan))****PETITION TO INTERVENE****OF BRAD ROUSE****Brad Rouse's Comments**

PURSUANT TO NCUC Rules R1-5, R1-7 and R1-19, Brad Rouse (AKA Harold Bradley Rouse) of Asheville, NC ("Petitioner"), files this petition to intervene in the above captioned case and provide the following information in support of their petition:

1. Brad Rouse is a resident of Asheville, NC, and a residential customer of Duke Progress. As a customer of Duke Progress, Mr. Rouse will be directly affected by the rate increases and environmental impacts of the Carbon Plan selected and implemented by Duke Progress.
2. As a father and grandfather, Mr. Rouse's heirs and descendants will be deeply affected by the extent to which our society succeeds in addressing the existential climate crisis. Duke's Carbon Plan is an essential element of our region's response to the climate crisis.
3. As a resident of the City of Asheville and Buncombe County, Mr. Rouse has been deeply involved in community activities to move the city and county to a cleaner energy future. Mr. Rouse is co-founder of the non-profit project, Energy Savers Network, which helps low-income people in the area save on energy costs. This effort is part of the larger Blue Horizons Project which is a collaboration of Duke Energy, Buncombe County, and City of Asheville, and which is the result of orders from this commission as part of DOCKET NO. E-2, SUB 1089 to establish a community collaboration as part of its Western North Carolina Modernization Plan. Mr. Rouse has been an active participant in this collaboration since its inception and is currently a member of the Blue Horizons Project Community Council. During 2022-2023 he served as technical and modeling lead for the development of a strategic plan for Buncombe County to achieve a goal of 100% clean energy by 2042. As a result, he has special knowledge about these community efforts and a special interest in these proceedings.
4. Mr. Rouse has specific knowledge of the utility industry and planning techniques in the field of utility Integrated Resource Planning. He also has specific knowledge of Duke Energy Progress as he, as an employee of Data Resources, Inc., led the development of the first economics-based load forecasting system for the Carolina Power and Light

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Company (CPL), which is now Duke Progress. Mr. Rouse also consulted with CPL and Duke Power as a Vice President of Energy Management Associates. He is aware of the process used by Duke to define and evaluate scenarios to meet the desired carbon reductions at least cost, having led the development of PROVIEW, a leading software system used by Duke and others to create optimal portfolios under environmental constraints. Duke was an early customer of PROVIEW and continued to use it for IRP work until choosing EnCompass, a product of Anchor Power Systems) for the Carbon Plan. EnCompass development included major contributions by former employees of Mr. Rouse's organization. In 2022 Mr. Rouse published *Climate Warrior: Climate Activism and Our Energy Future*. He holds a BA from Yale in economics and an MBA from the University of North Carolina at Chapel Hill.

5. Mr. Rouse has testified before utilities commissions in Montana and Georgia, and in 2022 he intervened pro se before this commission in Docket No. E-100 Sub 179, calling himself as an expert witness in that case. His initial comments, expert testimony, and final hearing brief and partial proposed order are part of the record of that case.

Mr. Rouse believes that his testimony can be of value to the commission given his background and experience.

6. The Petitioner to whom all correspondence and filings in this docket should be addressed is:

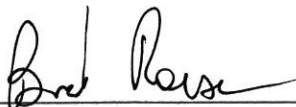
Brad Rouse
3 Stegall Lane
Asheville, NC 28805
Telephone: 404.754.0892
Email: brouse_invest@yahoo.com

7. Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to brouse_invest@yahoo.com.

WHEREFORE, for the foregoing reasons, Brad Rouse respectfully requests that the Commission:

1. Grant his request that he be permitted to intervene and become a party to this docket;
2. Grant his request that he be permitted to file comments and other papers, examine witnesses, and be heard on matters relative to the issues involved in this docket; and
3. Grant it such other and further relief as the Commission deems just and proper.

Respectfully submitted this 8th day of January 2024.



Brad Rouse

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CERTIFICATE OF SERVICE

The undersigned certifies that he has served a copy of the foregoing PETITION TO INTERVENE IN NCUC DOCKET E-100 Sub 190, Carbon Plan of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC upon the parties of record in this proceeding by email, this the 8th day of January 2024.


Brad Rouse

VERIFICATION

I, Brad Rouse, verify that the contents or the foregoing Petition to Intervene are true to the best of my knowledge, except for those matters stated on information and belief, and as for those matters, I believe them to be true.


Brad Rouse
Date: 1/8/2024

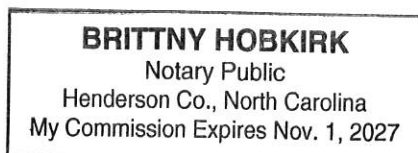
Buncombe County, North Carolina

Sworn to and subscribed before me this day by Brad Rouse this 8th day of January 2024.



Signature

, Notary Public



My commission expires:

11/1/2027