

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 190

In the Matter of		
Biennial Consolidated Carbon Plan and)	
Integrated Resource Plans of Duke Energy)	PETITION TO INTERVENE
Carolinas, LLC, and Duke Energy)	OF GOOGLE LLC
Progress, LLC, Pursuant to)	
N.C.G.S. § 62-110.9 and § 62-110.1(c))	

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, Google LLC (“Petitioner” or “Google”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-referenced docket. In support of the petition, Petitioner provides the following information:

1. Google LLC is a limited liability company duly organized under the laws of the State of Delaware, with corporate headquarters located at 1600 Amphitheatre Parkway, Mountain View, California 94043.

2. Google’s attorneys in this matter, to whom all communications and pleadings should be addressed, are:

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3. Google is a provider of online services and products. In connection with these business operations, Google, through its affiliates, owns and operates data centers

and related infrastructure in North Carolina, including in the service territory of Duke Energy Carolinas LLC (“DEC”).

4. Data centers are high load factor facilities that use energy on a 24-hours-a-day, 7-days-a-week basis. The availability of an adequate and reliable supply of electricity on reasonable terms and conditions, including appropriate consideration of environmental policy goals, is critically important to Google’s data center operations and the businesses supported by those operations.

5. DEC’s 2023 Carbon Plan and Integrated Resource Plan (“CPIRP”), which is being jointly developed with its sister company, Duke Energy Progress, LLC (collectively, “Duke Energy”), will have a direct and significant impact on Google’s business operations and the achievement of its environmental policy goals.

6. Google’s participation in this docket will bring the important perspective of large, high load-factor customers with regard to the impact on generation planning and related issues resulting from the requirement of S.L. 2021-165 that the Commission review and update the initial Carbon Plan.

7. Google, through the Tech Customers coalition, was permitted intervention in Docket No. E-100, Sub 179 in the development of Duke Energy’s initial Carbon Plan and was an active participant in that proceeding, including through the development of independent modeling.

8. Google has a direct, substantial and vital interest in the matters at issue that cannot be adequately represented by any other party and should be permitted to intervene and participate as a party to this proceeding.

9. Pursuant to Rule R1-39, Google agrees to accept electronic service of all filings in this proceeding.

WHEREFORE, Google LLC respectfully requests that the Commission enter an order allowing it to intervene in the above-captioned proceeding, including the right to discovery and to otherwise exercise all statutory rights provided to intervenors under North Carolina law.

Respectfully submitted, this 26th day of March, 2024.



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Attorneys for Google LLC

VERIFICATION

Marcus W. Trathen, first being duly sworn, deposes and says that he is the attorney for Google LLC; 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 Google LLC.

This the 26th day of March, 2024.



Sworn to and subscribed before me
this 26th day of March, 2024.


Notary Public 

Commission Expires: 7/18/2024



Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene of Google LLC* has been served this day upon all parties of record in this proceeding, or their legal counsel, by electronic mail or by delivery to the United States Post Office, first-class postage pre-paid.

This the 26th day of March, 2024.

BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, LLP


