

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-34, SUB 54

In the Matter of:)
Application of Appalachian State)
University, d/b/a New River Light)
and Power Company For) **PETITION TO INTERVENE**
Adjustment of General Base Rates)
and Charges Applicable to Electric)
Service)

PURSUANT TO North Carolina Utilities Commission (Commission or NCUC) Rule R1-19, Appalachian Voices (App Voices), through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. On December 22, 2022, Appalachian State University d/b/a New River Light and Power Company (NRLP), pursuant to N.C. Gen. Stat. §§ 62-133 and 134 and Commission Rules R1-5, R1-17, and R8-27, filed its application for authority to adjust and increase electric rates and charges.

2. App Voices is a regional, non-profit environmental organization with an office in Boone, North Carolina, along with other offices in Virginia and Tennessee. App Voices has approximately 40,000 members and supporters, including 6,800 in North Carolina, and is dedicated to protecting the land, air, and water of Central and Southern Appalachia and advancing a just transition to a generative and equitable clean energy economy. App Voices' Boone office is located at 589 W. King Street, Boone, NC 28607.

3. App Voices and its members have a direct and substantial interest in this proceeding. Many of the members represented by App Voices are NRLP

customers and will therefore be subject to the direct impacts of NRLP's general rate case application. App Voices seeks to intervene and participate in this proceeding to ensure that its interests in promoting rooftop solar and energy efficiency, and its concerns about the energy burdens ultimately borne by low-income households are represented.

4. The attorneys for App Voices to whom all correspondence and filings in this docket should be addressed are:

Nicholas Jimenez
Munashe Magarira
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to njimenez@selcnc.org and mmagarira@selcnc.org.

WHEREFORE, Appalachian Voices requests that it be allowed to intervene in this docket.

Respectfully submitted this the 18th day of January, 2023.

/s/ Munashe Magarira
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Attorneys for Appalachian Voices

CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 18th day of January, 2023.

/s Munashe Magarira
Munashe Magarira

VERIFICATION

I, Munashe Magarira, verify that the contents of the foregoing Petition to Intervene 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 of Appalachian Voices.

Munashe Magarira
Munashe Magarira
Date: 01/18/2023

Orange County, North Carolina

Sworn to and subscribed before me by Munashe Magarira.

This the 18 day of January, 2023

Mindy D Campbell
Signature

Mindy D. Campbell, Notary Public

My commission expires: March 17, 2027

