

November 22, 2021

Via Electronic Filing

Ms. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

Re: In the Matter of: Rulemaking Proceeding to Implement Securitization of
Early Retirement of Subcritical Coal-Fired Generating Facilities;
Docket No. E-100, Sub 177

Dear Ms. Dunston:

I attach a Petition to Intervene for filing on behalf of the Sierra Club and Natural Resources Defense Council in the above-referenced docket, and request that the Commission accept the petition for filing despite the absence of the verification required by Commission rules. Our office is closed due to the coronavirus pandemic and our staff, including paralegals with notary credentials, are working remotely. A verification will be filed as soon as practicable and safe for our staff to execute the document in the presence of a notary public.

Please let me know if you have any questions about this filing.

Sincerely,

s/ Gudrun Thompson

GT
Enclosures
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 177

In the Matter of:)
)
Rulemaking Proceeding to) PETITION TO INTERVENE BY
Implement Securitization of Early) SIERRA CLUB AND NATURAL
Retirement of Subcritical Coal-Fired) RESOURCES DEFENSE COUNCIL
Generating Facilities)
)

PURSUANT TO North Carolina Utilities Commission (“Commission”) Rule R1-19, the Sierra Club and the Natural Resources Defense Council (collectively, “Petitioners”) file this petition to intervene in the above-captioned docket and provide the following information in support of their petition:

1. The Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club works to accelerate the transition from dirty fuels like coal and gas to clean energy solutions like solar, wind and energy efficiency, and advocates for state and federal policies and industry action to achieve this transition. The Sierra Club has a long history of working to reduce air pollution from coal-fired power plants and to promote clean energy sources in North Carolina, and its members include customers of our state’s regulated electric utilities. The address of the Sierra Club’s principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601.

2. The Natural Resources Defense Council (“NRDC”) is a national environmental organization with over 30 years’ experience working on state energy policy, including utility regulation and energy efficiency. NRDC, and its members in North Carolina who receive electricity service from electric utilities regulated by the Commission, have a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies. NRDC works to promote renewable energy and to advocate for the passage and implementation of clean energy standards and other policies that expand the market for wind and solar power. NRDC also works to promote energy efficiency and conducts research, partners with manufacturers, and advocates for policies that create dramatic energy savings. NRDC has headquarters at 40 West 20th Street, New York, New York 10011, and also has an office in Asheville, North Carolina.

3. Petitioners and their members have a direct and substantial interest in the electric systems of North Carolina electric utilities. Petitioners seek to intervene in this proceeding in order to participate in this important proceeding concerning the provision of electricity in our state. Petitioners and their members are interested in facilitating early retirement of subcritical coal generating facilities to meet State carbon-reduction goals while minimizing costs to ratepayers. If allowed to intervene, Petitioners will advocate for rules that will further those objectives.

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

Gudrun Thompson
Tirrill Moore
Southern Environmental Law Center

601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

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

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 22nd day of November, 2021.

s/Gudrun Thompson
Gudrun Thompson
N.C. Bar No. 28829
Tirrill Moore
N.C. Bar No. 52299
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*Attorneys for Sierra Club and Natural Resources
Defense Council*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene by the Sierra Club and Natural Resources Defense Council as filed today in Docket No. E-100, Sub 177 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 22nd day of November, 2021.

s/Gudrun Thompson
Gudrun Thompson