

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. EMP-92, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Application of NTE Carolinas II, LLC, for)	MOTION TO INTERVENE
a Certificate of Public Convenience and)	BY NC WARN
Necessity to Construct a 500-MW Natural)	
Gas-Fueled Merchant Power Plant in)	
Rockingham County, North Carolina)	

PURSUANT TO NCUC Rule R1-19, and the Order Scheduling Hearing, Requesting Filing of Testimony, Establishing Procedural Deadlines, and Requiring Public Notice, filed August 16, 2016, now comes the NC Waste Awareness and Reduction Network, Inc. ("NC WARN"), by and through the undersigned attorney, with a motion to allow them to intervene in this docket.

In support of the motion is the following:

1. NC WARN is a not-for-profit corporation under North Carolina law, with more than one thousand individual members and families across North Carolina. Its primary purpose is to work for climate protection through the advocacy of clean, efficient, and affordable energy. Its address is Post Office Box 61051, Durham, North Carolina 27715-1051.

2. The attorney for the Intervenors to whom all correspondence and filings should be addressed is John Runkle, Attorney at Law, 2121 Damascus Church Road, Chapel Hill, North Carolina 27516. Rule 1-39 service by email is acceptable and may be sent to jrunkle@pricecreek.com.

3. Members of NC WARN are concerned about the economic and environmental and climate costs of a natural gas future, and the impacts of those costs on themselves, their families, and their livelihood. Members of NC WARN are customers of electrical membership cooperatives and municipalities who may become wholesale customers of the proposed NTE merchant plant. Members of NC WARN live in the Winston-Salem and Reidsville areas of North Carolina who may be effected adversely by emissions from the proposed NTE merchant plant.

4. NC WARN has intervened in various dockets before the Commission, most recently in projects using natural gas as a fuel, such as the Asheville natural gas project, Docket No. E-2, Sub 1089. NC WARN routinely intervenes in the annual dockets of the utilities' integrated resource plans (IRPs).

5. If allowed to intervene in this docket, NC WARN will advocate that the Commission fully investigate the need for the proposed NTE plant, its impacts on ratepayers, and its impacts on climate issues.

THEREFORE, NC WARN prays that it is allowed to intervene in this matter and fully participate in the Commission's deliberations.

Respectfully submitted, this the 5th day of October 2016.

/s/ John D. Runkle

John D. Runkle
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing MOTION TO INTERVENE BY NC WARN upon each of the parties of record in this proceeding or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This is the 5th day of October 2016.

/s/ John D. Runkle

VERIFICATION

I, James Warren, Executive Director of NC WARN, verify that the contents of the above filing in this docket 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.

James Warren
James Warren

Date 10/4/16

Sworn to and subscribed before me

This the 4th day of October, 2016

Anna Henry
Notary Public

My commission expires: 1/6/2018

(seal)

