

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 919-967-1450

601 WEST ROSEMARY STREET, SUITE 220
CHAPEL HILL, NC 27516-2356

Facsimile 919-929-9421

January 29, 2021

Via Electronic Filing

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

Re: In the Matter of 2020 Biennial Integrated Resource Plans and Related
2020 REPS Compliance Plans; Docket No. E-100, Sub 165

Dear Ms. Campbell:

I attach a Petition to Intervene for filing on behalf of Southern Alliance for Clean Energy, 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 165

In the Matter of:)	
2020 Biennial Integrated Resource)	PETITION TO INTERVENE BY
Plans and Related 2020 REPS)	SOUTHERN ALLIANCE FOR CLEAN
Compliance Plans)	ENERGY, SIERRA CLUB, AND
)	NATURAL RESOURCES DEFENSE
)	COUNCIL
)	

PURSUANT TO North Carolina Utilities Commission (“Commission”) Rule R1-19, Southern Alliance for Clean Energy, 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. Southern Alliance for Clean Energy (“SACE”) is a regional nonprofit organization whose mission is to promote responsible energy choices to address the impacts of global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electricity service from utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast’s energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy and wind energy through education and outreach in order to improve public health, the environment and the economy. SACE has its principal office in Tennessee, with a mailing address of Post

Office Box 1842, Knoxville, TN 37901, and also has offices in North Carolina, South Carolina, Florida and Georgia.

2. 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.

3. 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. Likewise, NRDC encourages states to fully account for efficiency potential when they forecast whether they need new power plants or transmission lines in order to avoid costly infrastructure and lower customers' bills. NRDC has headquarters at 40 West 20th Street, New York, New York 10011, and also has an office in Asheville, North Carolina.

4. Petitioners and their members have a direct and substantial interest in the Integrated Resource Plans ("IRPs") of North Carolina electric utilities. Petitioners and their members are interested in promoting greater reliance on energy efficiency and renewable energy by electric utilities in North Carolina. Moreover, Petitioners' members who receive electricity service at their homes and businesses from the utilities operating in our state will be affected by decisions made by the utilities in their resource planning processes—and by the Commission in this and future related proceedings, such as new plant certifications and rate cases.

5. Petitioners seek to intervene in this proceeding in order to participate in this important proceeding concerning the provision of electricity in our state. If allowed to intervene, Petitioners will advocate for integrated resource planning that evaluates resource alternatives based on robust methodology and assumptions and results in a low-cost, low-risk, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts, and will urge the Commission to undertake a detailed and searching review of the IRPs to ensure that they meet the requirements of North Carolina law and policy.

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

Gudrun Thompson
Nicholas Jimenez
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, njimenez@selcnc.org, and tmoore@selcnc.org.

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

Respectfully submitted this 29th day of January, 2021.

s/Gudrun Thompson
Gudrun Thompson
N.C. Bar No. 28829
Nicholas Jimenez
N.C. Bar No. 53708
Tirrill Moore
N.C. Bar No. 52299
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601 W. Rosemary Street, Suite 220
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421
gthompson@selcnc.org

*Attorneys for Southern Alliance for Clean Energy,
Sierra Club, and Natural Resources Defense
Council*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene by Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council as filed today in Docket No. E-100, Sub 165 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 29th day of January, 2021.

s/ Gudrun Thompson