

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1295

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Duke Energy Progress,
LLC for Approval of Joint Agency Asset
Rider for Recovery of Costs Related to
Facilities Purchased from Joint Power
Agency Pursuant to N.C. Gen. Stat.
§ 133.14 and Rule R8-70

PETITION TO INTERVENE OF
CIGFUR II

NOW COMES the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), pursuant to Commission Rules R1-5 and R1-19, and files this petition to intervene. In support of this petition, CIGFUR II respectfully shows as follows:

1. CIGFUR II is an association of purchasers of electric power from Duke Energy Progress, LLC (DEP).
2. CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at ccress@bdixon.com.
3. As customers and ratepayers of DEP, CIGFUR II's member companies have direct, substantial, and pecuniary interests in this proceeding.
4. No other party is capable of adequately representing or protecting CIGFUR II's interests in this proceeding. As such, CIGFUR II should be permitted to intervene and participate as a party to this proceeding.

5. CIGFUR II's attorney, to whom all communications and pleadings should be addressed, is shown below:

Christina D. Cress
Bailey & Dixon, LLP
434 Fayetteville Street, Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com

6. Pursuant to Commission Rule R1-39, CIGFUR II agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR II respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 16th day of June, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress
Christina D. Cress
N.C. State Bar No. 45963
434 Fayetteville St., Suite 2500
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com
Attorneys for CIGFUR

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR II; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters or things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR II.

This the 16th day of June, 2022.

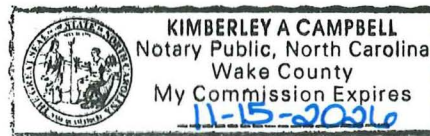

Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 16th day of June, 2022, by Christina D. Cress.


Notary Public



Kimberley A. Campbell
Typed or Printed Notary Public Name

My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR II hereby certifies that she caused the foregoing *Petition to Intervene of CIGFUR II* to be served upon all parties of record to this proceeding by electronic mail.

This the 16th day of June, 2022.

/s/ Christina D. Cress
Christina D. Cress

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