

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 180

In the Matter of:)	PETITION TO INTERVENE
)	OF
Investigation of Proposed Net)	
)	ENVIRONMENTAL WORKING
Metering Policy Changes)	GROUP
)	

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7 and R1-19, the Environmental Working Group (“EWG”), through undersigned counsel, hereby petitions to intervene and participate in the above-captioned proceeding. In support of this petition, EWG states as follows

1. EWG is a 501(c)(3) non-profit, non-partisan organization that works to empower people to live healthier lives in a healthier environment. EWG does this, in part, by creating and sharing research reports and consumer guides that help people educate themselves about the food they consume, the products they buy, and the companies they support, so that everyone can make safer and more informed choices. In furtherance of its mission, EWG engages in research and policy advocacy on a broad range of issues related to state and federal energy policy, climate change, renewable energy, toxic chemicals, food and agriculture, water and air pollution, and public health. EWG’s regulatory focus of energy policy has included rate design and public policy issues related to consumer use of an access to solar. EWG has participated in utility commission proceedings in California involving net metering and a Duke Energy Indiana rate proceeding before the Indiana Utility Regulatory Commission, intervening jointly with Citizens Action Coalition of Indiana.

2. EWG has a strong presence in North Carolina. EWG's supporters engage with the organization in a variety of ways online. Across our three major social media platforms, we have approximately 1 million followers: 63,000 on Twitter, 231,000 on Instagram, and 720,000 "likes" on Facebook. Our websites, which hosts our consumer-focused databases and guides, are visited 27 million times per year by 16 million users, including 422,090 from North Carolina. To learn more about our supporters' concerns and opinions, we email a survey to our supporters at least once a month. More than 3 million supporters have signed up to receive these emails of which 435,000 are currently active, including 9,938 supporters from North Carolina.

3. EWG has a history of working with North Carolina organizations to protect the environment and health of all North Carolinians. Since 2016, EWG has partnered with Waterkeeper Alliance to expose the location of concentrated animal feeding operations in North Carolina. Through detailed geospatial maps relied upon by North Carolina farmers, residents, lawmakers, and environmentalists, EWG exposes the concentrated animal feeding operations, or CAFOs, which produce 10 billion gallons of bacteria-laden, liquefied hog waste per year. Likewise, EWG has an ongoing mapping project that documents publicly known perfluoroalkyl and polyfluoroalkyl substances ("PFAS") pollution in North Carolina's public water systems and on or near military bases, airports, industrial plants and dumps, and firefighter training sites. North Carolina's Cape Fear River basin is a source of PFAS contamination, plagued by the dumping of PFAS chemicals in the river for more than four decades by DuPont, and its spin-off, Chemours. EWG, working with Clean Cape Fear, has lobbied in Congress for better drinking standards and water cleanup funding to address the PFAS crisis across the

country and in North Carolina. EWG is a founding member of the Duke Energy Accountability Coalition that consists of advocacy organizations in each state where Duke Energy operates a monopoly utility subsidiary, including NCWARN, 350 Triangle, 350 Charlotte and Appalachian Voices based in North Carolina. Moreover, EWG has published several reports and articles chronicling Duke Energy's operations and business plans. EWG policy and influence on North Carolina environmental health matters is also informed by its board member and Chapel Hill, North Carolina resident, and former secretary of the North Carolina Department of Environmental and Natural Resources, William Ross, Jr.

4. EWG, through its supporters who are both participants and non-participants of the Duke Energy Net Energy Metering ("NEM") program, has a significant interest in the Commission developing a NEM program that supports sustainable growth of rooftop solar. EWG is interested in ensuring that NEM policy successfully drives decarbonization in order to avoid climate change's worst impacts on North Carolina's frontline communities, enhances access to customer generation for underserved communities, and sets North Carolina on a course towards greater sustainability, equity, and resilience.

5. EWG seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the investigation of Proposed Net Metering Policy Changes.

6. The address of the EWG's Headquarters office in Washington, DC is 1250 Street NW, Suite 1000, Washington, DC 20005.

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

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**pro hac vice* admission pending

8. The above counsel for EWG, pursuant to Commission Rule RI-39, agree to electronic service of all pleadings and other filings in this matter.

WHEREFORE, Environmental Working Group respectfully request that they be allowed to intervene in this matter.

Respectfully submitted this 17th day of February, 2022.



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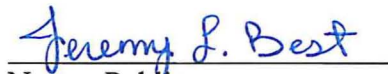
Feb 11 2022

VERIFICATION

I, Catherine Cralle Jones, verify that the contents of the foregoing *Petition to Intervene of the Environmental Working Group* 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 the Environmental Working Group.


CATHERINE CRALLE JONES

Sworn to and subscribe before me
This the 11th day of February, 2022


Notary Public

Commission expires: 8/11/2024



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Petition to Intervene* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 10th day of February, 2022.

LAW OFFICE OF F. BRYAN BRICE, JR.

By: Catherine Cralle Jones
Catherine Cralle Jones

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Feb 11 2022