

5. As purchasers of electric power from DEP, the member companies of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding.

6. As purchasers of electric power from DEC, the member companies of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding.

7. CIGFUR's participation in this docket will bring the important perspective of large, high load-factor industrial customers of DENC, DEP, and DEC, respectively, to the rules governing the process by which certificates of public convenience and necessity (CPCNs) are granted. Because the CPCN process is the regulatory mechanism through which utility capital projects are certificated and evaluated in terms of costs, benefits, and potential alternatives, ratepayers like CIGFUR member companies have direct, substantial, and pecuniary interests in this proceeding.

8. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress
Bailey & Dixon, LLP
P.O. Box 1351
Raleigh, NC 27602-1351
(919) 607-6055
ccress@bdixon.com

9. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

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

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

Respectfully submitted this the 18th day of October, 2021.

BAILEY & DIXON, LLP



Christina D. Cress
NC Bar No. 45963
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Attorneys for CIGFUR
Post Office Box 1351
Raleigh, North Carolina 27602
(919) 607-6055

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and 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.

This 18th day of October, 2021.



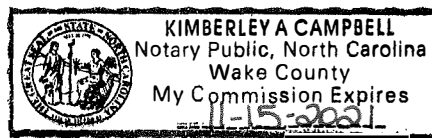
Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

this 18th day of October, 2021, by Christina D. Cress.

Kimberley A. Campbell
Notary Public



Kimberley A. Campbell
Typed or Printed Notary Public Name

My Commission Expires: 11-15-2021

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she served the foregoing Petition to Intervene upon the parties to this proceeding, as listed on the service list available on the NCUC's online docket system, by electronic mail.

This the 18th day of October, 2021.



Christina D. Cress