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December 16, 2019

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

**RE: *Application by Duke Energy Carolinas, LLC for Adjustment of Rates and Charges  
Applicable to Electric Utility Service in North Carolina  
NCUC Docket No. E-100, Sub 101  
NCUC Docket No. E-2, Sub 1159  
NCUC Docket No. E-7, Sub 1156***

Dear Ms. Campbell:

On behalf of Fair Bluff Solar, LLC and Homer Solar, LLC, together, we submit the attached **Petition to Intervene** in the above-referenced docket.

Should you have any questions concerning this testimony or exhibits attached thereto, please do not hesitate to contact me.

Sincerely,

*/s/ Karen M. Kemerait*

Karen M. Kemerait

skb

CC: All Parties of Record  
Enclosures

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota  
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. E-100, SUB 101  
DOCKET NO. E-2, SUB 1159  
DOCKET NO. E-7, SUB 1156**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:  
Application by Duke Energy Carolinas,  
LLC for Adjustment of Rates and Charges  
Applicable to Electric Utility Service in  
North Carolina

**PETITION TO INTERVENE BY  
FAIR BLUFF SOLAR, LLC AND  
HOMER SOLAR, LLC**

NOW COME Fair Bluff Solar, LLC and Homer Solar, LLC (together, “Petitioners”), pursuant to North Carolina Utilities Commission (“Commission”) Rule R1-19, and petition the Commission for leave to intervene in these proceedings.

In support of this Petition, Petitioners state the following.

1. The names and addresses of the Petitioners are:

Fair Bluff Solar, LLC  
130 Roberts Street  
Asheville, North Carolina 28801  
(704) 376-2767  
E-mail: [bcatt@pgrenewables.com](mailto:bcatt@pgrenewables.com)

Homer Solar, LLC  
130 Roberts Street  
Asheville, North Carolina 28801  
(704) 376-2767  
E-mail: [bcatt@pgrenewables.com](mailto:bcatt@pgrenewables.com)

2. The name and address of Petitioners’ attorney is:

Karen M. Kemerait  
Fox Rothschild LLP  
434 Fayetteville Street, Suite 2800  
Raleigh, NC 27601  
(919) 755-8764

E-mail: [kkemerait@foxrothschild.com](mailto:kkemerait@foxrothschild.com)

3. In the Commission's *Order Granting Limited Waiver* issued on December 6, 2018 in these dockets, the Commission temporarily waived the requirement pursuant to Section 4.3.9 of the North Carolina Interconnection Procedures for Fair Bluff Solar, LLC and Homer Solar, LLC. As such, Petitioners have a direct and substantial interest in the matters addressed by the Commission in these dockets. No other party can adequately represent Petitioners' interests, and Petitioners' participation would be in the public interest.

4. Petitioner requests that any notices, filings, or other communications in this docket be served on the following:

Karen M. Kemerait  
Fox Rothschild LLP  
434 Fayetteville Street, Suite 2800  
Raleigh, NC 27601  
E-mail: [kkemerait@foxrothschild.com](mailto:kkemerait@foxrothschild.com)

Ben Catt  
130 Roberts Street  
Asheville, North Carolina 28801  
(704) 376-2767  
E-mail: [bcatt@pgrenewables.com](mailto:bcatt@pgrenewables.com)

5. Pursuant to Commission Rule R1-39, Petitioners agree to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, Petitioners respectfully request that the Commission grant Petitioners' request that they be permitted to intervene and participate fully as parties to this docket.

Respectfully submitted this 16<sup>th</sup> day December, 2019.

FOX ROTHSCHILD, LLP

BY: Kamerait

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*Attorneys for Fair Bluff Solar, LLC and Homer  
Solar, LLC*

STATE OF CALIFORNIA  
COUNTY OF \_\_\_\_\_

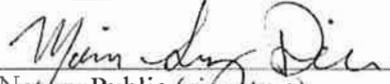
VERIFICATION

I, Ben Catt, being first duly sworn, depose and say that I am the Authorized Representative of Fair Bluff Solar, LLC and Homer Solar, LLC, that I am duly authorized to act on behalf of the Petitioners, that I have read the foregoing Petition to Intervene and that the same is true and accurate to my personal knowledge and belief.

This \_\_\_ day of December, 2019.

  
\_\_\_\_\_  
Ben Catt

Sworn to and subscribed before me  
this 16<sup>th</sup> day of December, 2019.

  
\_\_\_\_\_  
Notary Public (signature)

Monica Suarez Devia  
\_\_\_\_\_  
Notary Public (printed)

My Commission expires: Sept. 20, 2023



State of N.C  
County of Buncombe

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing **Petition to Intervene** has been duly served upon all persons on the Commission's docket service list by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery.

This the 16<sup>th</sup> day of December, 2019.

FOX ROTHSCHILD, LLC

BY:   
Karen M. Kemerait  
*Attorney for Fair Bluff Solar, LLC and Homer Solar, LLC*

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Dec 16 2019