

# CRISP & PAGE, PLLC

An Energy, Utility and Cooperative Law Firm

4010 Barrett Dr., Suite 205  
Raleigh, NC 27609-6622

Telephone (919) 791-0009  
Fax (919) 791-0010  
www.crisppage.com

**OFFICIAL COPY** August 14, 2019

**FILED**

**AUG 14 2019**

Clerk's Office  
N.C. Utilities Commission

Janice Fulmore, Deputy Clerk  
North Carolina Utilities Commission  
Dobbs Building, Fifth Floor  
430 North Salisbury Street  
Raleigh, North Carolina 27602

Re: Docket No. G-9, Sub 752; Piedmont Natural Gas Company's  
Annual Review of Gas Costs

**VIA HAND DELIVERY**

Dear Ms. Fulmore:

We enclose for filing in the above-referenced matter, on behalf of Carolina Utility Customers Association, Inc. ("CUCA"), an original and 33 copies of CUCA's Petition to Intervene. Kindly date-stamp and return to us via our courier the three additional enclosed copies. Please let me know, at your early convenience, if you have any questions concerning this filing.

Very truly yours,

CRISP & PAGE, PLLC

  
Robert F. Page

Enclosures

cc: Ms. Sharon Miller  
Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 752

In the Matter of	)	
Application of Piedmont Natural Gas	)	<b>Petition of Carolina Utility Customers</b>
Company, Inc., for Annual Review of	)	<b>Association, Inc. to Intervene</b>
Gas Costs Pursuant to G.S. 62-133.4(c)	)	
and Commission Rule R1-17(k)(6)	)	

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, files this Petition pursuant to G.S. 62-72 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") that CUCA be permitted to intervene and participate in the above-captioned proceeding. In support of this petition, CUCA states as follows:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at Suite 210, Trawick Professional Center, 1708 Trawick Road, Raleigh, North Carolina 27604. The names and addresses of its principal officers are:

Chair: David J. Lyons  
Gerdau Long Steel North America  
384 Old Grassdale Road NE  
Cartersville, GA 30121

Vice Chair: Sean M. Finsel  
Moen, Inc.  
2609 Cox Mill Road  
Sanford, NC 27332-9727

Executive Director: Sharon C. Miller  
Carolina Utility Customers Association, Inc.  
Suite 210, Trawick Professional Center  
1708 Trawick Road  
Raleigh, North Carolina 27604  
Email: smiller@cucainc.org

2. CUCA's attorney, to whom all communications and pleadings should be addressed, is shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Sharon Miller.

Robert F. Page  
Crisp & Page, PLLC  
4010 Barrett Drive, Suite 205  
Raleigh, NC 27609  
Telephone: (919) 791-0009  
Facsimile: (919) 791-0010  
Email: rpage@crisppage.com

3. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Piedmont Natural Gas Company, Inc. ("Piedmont") has been authorized by the Commission to sell natural gas at retail.

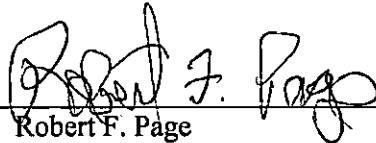
4. CUCA's member companies use natural gas sold and/or transported by Piedmont in the operation of their manufacturing plants. The availability of an adequate supply of natural gas at a reasonable price is critical to the economic viability of CUCA's member companies. Piedmont's filing will affect the rates associated with Piedmont's sale and transport of natural gas to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

5. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

This the 14<sup>th</sup> day of August, 2019.

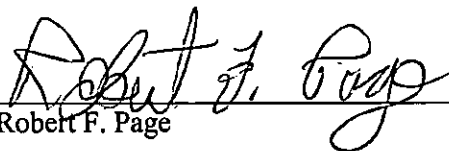
CRISP & PAGE, PLLC

By:   
Robert F. Page  
N.C. State Bar No. 3307  
4010 Barrett Drive, Suite 205  
Raleigh, NC 27609  
(919) 791-0009 Telephone  
(919) 791-0010 Fax  
rpage@crisppage.com Email

**CERTIFICATE OF SERVICE**

I, the undersigned counsel for CUCA, do hereby certify that a copy of the foregoing Petition to Intervene was served upon all parties of record in this proceeding, or their legal counsel, by electronic mail

This the 14<sup>th</sup> day of August, 2019.

  
Robert F. Page

**Electronic Service List**

Mr. Bruce Barkley, Piedmont Natural Gas Company – Bruce.Barkley@piedmontng.com

Ms. Pia Powers, Piedmont Natural Gas Company – pia.powers@piedmontng.com

Mr. James H. Jeffries, IV, McGuire Woods, LLP – jjeffries@mcguirewoods.com

Piedmont Natural Gas Company – kgoley@mcguirewoods.com

Mr. David Drooz, Public Staff NCUC – david.drooz@psncuc.nc.gov

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF WAKE

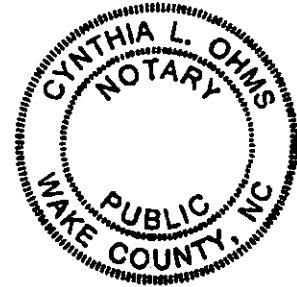
Sharon C. Miller, being duly sworn, deposes and says that she is the Executive Director of Carolina Utility Customers Association, Inc., the Intervenor herein; that she has read the foregoing Petition of Carolina Utility Customers Association, Inc., to Intervene, and knows the contents thereof, and that the same is true of her own knowledge, except as to those matters herein state upon information and belief, and as to those, she believes them to be true; and that this verified petition be used as an affidavit.

This the 14<sup>th</sup> day of August, 2019.

Sharon C. Miller  
SHARON C. MILLER

SWORN to and subscribed before me,  
This the 14<sup>th</sup> day of August, 2019.

Cynthia L. Ohms  
Notary Public



My Commission Expires: 2-3-2020