

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-2, SUB 1324

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. § 62-133.14 and Commission  
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 non-residential retail customers of Duke Energy Progress, LLC (DEP).
2. As ratepayers and purchasers of electric power from DEP, CIGFUR II's member companies have direct, substantial, and pecuniary interests in this proceeding.
3. CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at [ccress@bdixon.com](mailto:ccress@bdixon.com).
4. No other party is capable of adequately representing or protecting CIGFUR II's interests in this proceeding.

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

Christina D. Cress  
Douglas E. Conant  
Bailey & Dixon, LLP  
434 Fayetteville Street, Suite 2500  
P.O. Box 1351 (zip 27602)  
Raleigh, NC 27601  
(919) 607-6055  
[ccress@bdixon.com](mailto:ccress@bdixon.com)  
[dconant@bdixon.com](mailto:dconant@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 23<sup>rd</sup> day of June, 2023.


**BAILEY & DIXON, LLP**

/s/ Douglas E. Conant  
Christina D. Cress  
N.C. State Bar No. 45963  
Douglas E. Conant  
N.C. State Bar No. 60115  
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[dconant@bdixon.com](mailto:dconant@bdixon.com)  
*Attorneys for CIGFUR II*

**VERIFICATION**

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

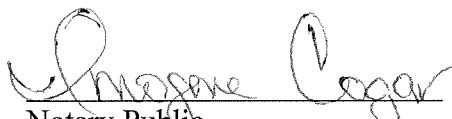
This the 23<sup>rd</sup> day of June, 2023.

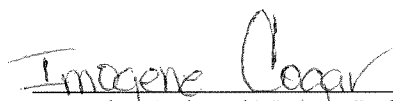
  
\_\_\_\_\_  
Douglas E. Conant

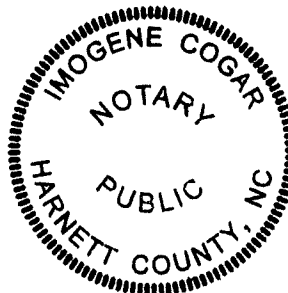
STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This 23<sup>rd</sup> day of June, 2023, by Douglas E. Conant.

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
Typed or Printed Notary Public Name



My Commission Expires: 10/1/2024

**CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR II hereby certifies that he caused the foregoing *Petition to Intervene of CIGFUR II* to be served upon all parties of record to this proceeding, as set forth in the Service List maintained by the NCUC Chief Clerk, by electronic mail.

This the 23<sup>rd</sup> day of June, 2023.

/s/ Douglas E. Conant  
Douglas E. Conant