

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 194

In the Matter of:)	
)	
Biennial Determination of Avoided)	PETITION TO INTERVENE
Cost Rates for Electric Utility)	OF THE SOUTHERN ALLIANCE
Purchases from Qualifying)	FOR CLEAN ENERGY
Facilities – 2023)	

PURSUANT TO Commission Rule RI-19 and the Commission's August 7, 2023 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing*, the Southern Alliance for Clean Energy, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. The Southern Alliance for Clean Energy (SACE) is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. The principal address of SACE is: P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has a presence in Florida, Georgia, North Carolina, and South Carolina.

2. SACE and its members have a direct and substantial interest in this proceeding. Many of SACE's members are customers of North Carolina electric utilities and, therefore, are impacted by the utilities' energy resource selections and ratemaking practices. SACE and its members are interested in promoting greater reliance on clean, low-cost energy resources to meet North Carolina's energy needs.

3. SACE has intervened, filed comments, presented expert testimony, and participated in evidentiary hearings in prior biennial avoided cost proceedings, including E-100, Sub 136; E-100, Sub 140; E-100, Sub 148; E-100, Sub 158; E-100, Sub 167; and E-100, Sub 175.

4. The attorney for SACE to whom all correspondence and filings in this docket should be addressed is:

Nicholas Jimenez
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to njimenez@selcnc.org.

WHEREFORE, SACE requests that it be allowed to intervene in this docket.


Respectfully submitted this 5th day of December, 2023.

/s/ Nicholas Jimenez
Nicholas Jimenez
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Attorney for the Southern Alliance for Clean Energy

VERIFICATION

I, Nicholas Jimenez, verify that the contents of the foregoing Petition to Intervene 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 Southern Alliance for Clean Energy.



Nicholas Jimenez

Date: December 5, 2023.

Durham County, North Carolina

Sworn to and subscribed before me this day by Nicholas Jimenez.

This the 5th day of December, 2023.



Signature

Mindy Campbell, Notary Public

My commission expires: March 17, 2027



CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 5th day of December, 2021.

s/ Nick Jimenez
Nick Jimenez