BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-2, SUB 931 DOCKET NO. E-7, SUB 1032

DOCKET NO. E-2, SUB 931 In the Matter of: Application of Duke Energy Progress, LLC, for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider Pursuant to N.C. Gen. Stat. § 62-133.9 and Commission Rule R8-69 DOCKET NO. E-7, SUB1032

PETITION TO INTERVENE ON BEHALF OF NORTH CAROLINA JUSTICE CENTER AND NORTH CAROLINA HOUSING COALITION

In the Matter of: Application of Duke Energy Carolinas, LLC, for Approval of New Cost Recovery Mechanism and Portfolio of Demand-Side Management and Energy Efficiency Programs

PURSUANT TO Commission Rule R1-19, the North Carolina Justice Center (NC Justice Center) and the North Carolina Housing Coalition (NC Housing Coalition) (collectively, Petitioners), through counsel, file this petition to intervene in the above-captioned dockets and to join with the Southern Alliance for Clean Energy (SACE), Natural Resources Defense Council (NRDC), South Carolina Coastal Conservation League (CCL), and Sierra Club, which intervened and have participated in these dockets since 2013. Petitioners provide the following information in support of their petition: 1. The NC Justice Center is a nonprofit research and advocacy organization whose mission is to eliminate poverty in North Carolina by ensuring that every household in the state has access to the resources, services, and fair treatment it needs to achieve economic security. The NC Justice Center has offices at 224 S. Dawson Street, Raleigh, North Carolina 27601. The electronic mailing address of petitioner NC Justice Center is Claire@ncjustice.org.

2. The NC Justice Center has previously intervened on behalf of its lowincome North Carolinian constituents in proceedings involving Duke Energy Carolinas (DEC) and Duke Energy Progress (DEP) before the Commission, including the last three rate cases and numerous Demand-Side Management/Energy Efficiency (DSM/EE) Cost-Recovery Rider dockets.

3. The NC Housing Coalition is a nonprofit membership organization with the goal of ensuring that every North Carolinian has access to safe, decent, and affordable housing. NC Housing Coalition works with its members to reduce the energy burdens faced by residents who require affordable housing. In addition, as part of its efforts to improve access to affordable housing for low-income individuals, the NC Housing Coalition advocates for fair and affordable utility rates and charges and for EE and DSM programs that can help lower the bills and improve the quality of life of low-income households. The principal address of the NC Housing Coalition is 3608 University Drive, Ste. 203, Durham, North Carolina 27707. The electronic mailing address of petitioner NC Housing Coalition is sgunter@nchousing.org.

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4. The NC Housing Coalition has previously intervened on behalf of its members in proceedings involving DEC and DEP before the Commission, including the last three rate cases and numerous DSM/EE Cost-Recovery Rider dockets.

5. The NC Justice Center, NC Housing Coalition, and their constituents and/or members have a direct and substantial interest in these proceedings. Many of their constituents and/or members are customers of DEC and DEP and will be subject to the direct impacts of Duke Energy's DSM/EE mechanism.

6. The NC Justice Center and NC Housing Coalition seek to intervene in these proceedings in order to ensure that their interests in promoting energy efficiency programs that help lift the energy burden borne by low-income households are represented.

7. The attorneys for the NC Justice Center and the NC Housing Coalition, to whom all correspondence and filings in this docket should be addressed are:

David Neal and Munashe Magarira Southern Environmental Law Center 601 West Rosemary Street, Suite 220 Chapel Hill, NC 27516 919-967-1450

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

WHEREFORE, the NC Justice Center and the NC Housing Coalition request that they be allowed to intervene in this docket.

Jan 25 2024

Respectfully submitted this the 25th day of January, 2024.

/s/ David L. Neal

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Attorneys for North Carolina Justice Center and North Carolina Housing Coalition

Jan 25 2024

## VERIFICATION

I, David Neal, 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 North Carolina Justice Center and North Carolina Housing Coalition.

R David L. Neal

David L. Neal Date: January 25, 2024

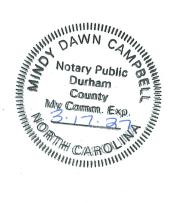
Durham County, North Carolina

Sworn to and subscribed before me this day by David Neal.

This the 25<sup>th</sup> day of January, 2024

Signature

Mindy D. Campbell, Notary Public My commission expires: March 17, 2027



**Jan 25 2024** 

## CERTIFICATE OF SERVICE

I certify that all parties of record 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 25th day of January, 2024.

<u>/s/ David L. Neal</u> David L. Neal