

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-7, SUB 1246

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:
Application of Duke Energy Carolinas, LLC,
for Approval of REPS Compliance Report and
REPS Cost Recovery Rider Pursuant to
N.C.G.S. § 62-133.8 and Commission Rule
R8-67

CIGFUR III'S
PETITION TO INTERVENE

NOW COMES the Carolina Industrial Group for Fair Utility Rates III ("CIGFUR III"), by and through the undersigned counsel, and files this petition to intervene pursuant to N.C. Gen. Stat. § 62-72 and Commission Rule R1-19. In support of its petition, CIGFUR III shows:

1. CIGFUR III is an association of purchasers of electric power from Duke Energy Carolinas, LLC ("DEC"). CIGFUR III's member companies use electricity sold by DEC in the operation of their manufacturing plants.
2. CIGFUR III's address is Post Office Box 1351, Raleigh, North Carolina 27602-1351, and it may be contacted by email through its counsel at ccress@bdixon.com.
3. CIGFUR III's attorneys, to whom all communications and pleadings should be addressed, are shown below.

Christina D. Cress
Bailey & Dixon, LLP
P. O. Box 1351
Raleigh, NC 27602-1351
(919) 607-6055
ccress@bdixon.com

4. As purchasers of electric power from DEC, the members of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding, and pursuant to Commission Rule R1-19, CIGFUR III has a right to intervene in this proceeding.


5. No other party is capable of adequately representing or protecting CIGFUR III's interests in this proceeding. As such, CIGFUR III has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

6. Pursuant to Commission Rule R1-39, CIGFUR III agrees to electronic service of all pleadings and other papers in this docket.

WHEREFORE, CIGFUR III respectfully requests that the Commission issue an order allowing CIGFUR III to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted: April 22, 2021.

BAILEY & DIXON, LLP

By: 
Christina D. Cress
N.C. State Bar No. 45963
ccress@bdixon.com
Attorneys for CIGFUR III
Post Office Box 1351
Raleigh, North Carolina 27602
(919) 828-0731

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR III; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR III.

This the 22nd day of April, 2021.

By: [Signature]
Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me this the 22nd day of April, 2021, by Christina D. Cress.

[Signature]
Notary Public

Cheryl Kuntze
Typed or Printed Notary Name

My Commission Expires: 05/25/2022



CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR III hereby certifies that she served the foregoing Petition to Intervene upon the parties of record in this proceeding by electronic mail.

This the 22nd day of April, 2021.

By: 
Christina D. Cress