

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 180

In the Matter of:)	PETITION TO INTERVENE
)	
Investigation of Proposed Net)	OF
)	
Metering Policy Changes)	NC-APPPL

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7 and R1-19, the North Carolina Alliance to Protect our People and the Places We Live (“NC-APPPL”) through undersigned counsel, hereby petitions to intervene and participate in the above-captioned proceeding. In support of this petition, NC-APPPL states as follows:

1. NC-APPPL is a 501(c)(3) non-profit, non-partisan organization, organized under the laws of North Carolina as a nonprofit organization.

2. The mission of NC-APPPL is to confront and address ongoing environmental and economic injustices plaguing eastern North Carolina, by engaging and creating opportunities for public conversation about climate change, environmental justice and other interrelated issues. NC-APPPL provides and empowers others to provide public testimony through public hearings and written comment to key regulators and government officials, including but not limited to the Federal Energy Regulatory Commission, NC Department of Environmental Quality, and the NC Utilities Commission and elected officials at the local, state and federal level.

3. NC-APPPL has a seven-member board of directors, a founding circle of twenty, and a state-wide reach of individuals who support its work. NC-APPPL was

originally formed in 2016 to organize opposition to the Atlantic Coast Pipeline and continues the related mission of challenging continued dependence on fossil fuels and supporting impacted communities.

4. NC-APPPL works with members of the public and other North Carolina organizations to advocate for clean energy and environmental justice, especially in eastern NC. NC-APPPL is involved in the present Duke Energy Stakeholder Process on the Carbon Plan, and is working with several coalitions seeking clean energy portfolio in the state. NC-APPPL was heavily involved in the 2021 NCUC public hearings on the IRPs.

5. NC-APPPL has a significant interest in the Commission developing a NEM program that supports successful growth of rooftop solar, including access by North Carolina's most vulnerable communities, and setting North Carolina on a course towards greater sustainability, equity, resilience, and economic vitality.

6. The address of NC-APPPL's Headquarters office is 1314 Puncheon Fork Road, Mars Hill, NC 28754.

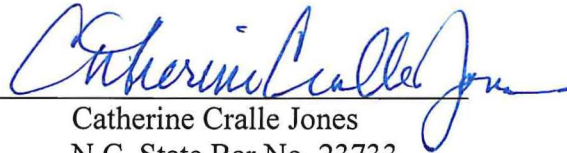
7. The attorneys for NC-APPPL to whom all correspondence and filings in this docket should be addressed are:

Catherine Cralle Jones
Andrea Bonvecchio
127 W. Hargett St., Ste. 600
Raleigh, N.C. 27601
Telephone: 919-754-1600
Facsimile: 919-573-4252
cathy@attybryanbrice.com
andrea@attybryanbrice.com

8. The above counsel for NC-APPPL, pursuant to Commission Rule R1-39, agree to electronic service of all pleadings and other filings in this matter.

WHEREFORE, NC-APPPL, respectfully requests that it be allowed to intervene in this matter.

Respectfully submitted this 25th day of February, 2022.



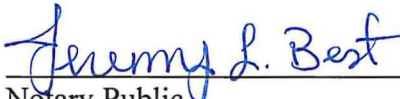
Catherine Cralle Jones
N.C. State Bar No. 23733
Andrea Bonvecchio
N.C. State Bar No. 56438
LAW OFFICE OF F. BRYAN BRICE, JR.
127 W. Hargett St., Ste. 600
Raleigh, N.C. 27601
Telephone: 919-754-1600
Facsimile: 919-573-4252
cathy@attybryanbrice.com
andrea@attybryanbrice.com
Counsel for NC-APPPL

VERIFICATION

I, Catherine Cralle Jones, verify that the contents of the foregoing *Petition to Intervene of NC-APPPL* 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 NC-APPPL.


CATHERINE CRALLE JONES

Sworn to and subscribed before me
This the 25th day of February, 2022


Notary Public

Commission expires: 8/11/2024



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Petition to Intervene* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 25th day of February, 2022.

LAW OFFICE OF F. BRYAN BRICE, JR.

By: Catherine Cralle Jones
Catherine Cralle Jones