

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100 Sub 190
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In the Matter of:)
Biennial Consolidated Carbon Plan and)
Integrated Resource Plans of Duke Energy)
Carolinas, LLC and Duke Energy Progress,)
LLC, Pursuant to N.C.G.S. § 62-110.9 and §)
62-110.1(c))
DOCKET NO. E-100 Sub 191)
In the Matter of:)
Rulemaking Proceeding Related to Biennial)
Consolidated Carbon Plan and Integrated)
Resource Plans of Duke Energy Carolinas,)
LLC and Duke Energy Progress, LLC,)
Pursuant to N.C.G.S. § 62-110.9 and § 62-)
110.1(c))

NCSEA’S PETITION TO
INTERVENE

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Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the above-referenced dockets. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy

efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.

2. On December 30, 2022, the Commission issued its *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning*, providing guidance for the timing and participation of intervenors during the development of the 2024 Carbon Plan-Integrated Resource Plan (“CPIRP”). On March 15, 2023, the Commission issued its *Order Establishing Biennial Proceedings and Opening Dockets*, which opened Docket No. E-100 Sub 190 for the purposes of receiving testimony for the 2024 CPIRP and Docket No. E-100 Sub 191 for the purposes of receiving testimony regarding the proposal of a new Commission rule governing future consolidated Carbon Plan and Integrated Resource Plan proceedings. On May 3, 2023, the Commission issued its *Order Establishing Comment Deadlines*, establishing intervention and comment deadlines of May 25, 2023 for Docket No. E-100 Sub 191.

3. NCSEA was allowed to intervene and actively participated in previous Integrated Resource Plan and Carbon Plan processes, including in 2010-11 (E-100 Sub 128), 2012-13 (E-100 Sub 137), 2014-15 (E-100 Sub 141), 2016-17 (E-100 Sub 147), 2018 (E-100 Sub 157), 2020 (E-100 Sub 165), and 2022 (E-100 Sub 179).

4. NCSEA was actively involved in the negotiations that led to the enactment of House Bill 951 (“HB 951”), which necessitates the Carbon Plan process. The interests of NCSEA’s members are not represented by any other party to the proceeding. As such,

NCSEA has an interest in ensuring that HB 951 is implemented in accordance with the intent of the legislature.

5. NCSEA’s participation in these dockets will bring critical insight, knowledge, and understanding to the proceeding.

6. NCSEA’s address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Taylor Jones
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7. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in these matters.


Respectfully submitted this the 23rd day of May, 2023,

/s/ Ethan Blumenthal
Ethan Blumenthal
N.C. State Bar No. 53388
Regulatory Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(704) 618-7282
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VERIFICATION

Ethan Blumenthal, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and 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 NCSEA.

This the 2³rd day of May, 2023.



Ethan Blumenthal

NORTH CAROLINA
MECKLENBURG COUNTY

Sworn to and subscribed before me,

this the 2³rd day of May, 2023.

[AFFIX SEAL OF NOTARY]



Notary Public

VICTORIA M BROWN
Notary Public
Mecklenburg Co., North Carolina
My Commission Expires Oct. 3, 2027

Victoria M. Brown
Printed Name of Notary Public
My Commission Expires: October 3, 2027

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service lists have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 23rd day of May, 2023.

/s/ Ethan Blumenthal

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