

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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))	
		<u>NC WARN'S PETITION TO INTERVENE</u>

NC WARN, through undersigned counsel, pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7 and R1-19, respectfully petitions to intervene and participate in the above-captioned proceeding. In support of this petition, NC WARN states as follows:

1. NC WARN is a not-for-profit corporation organized and existing under the laws of the State of North Carolina. NC WARN has approximately one thousand individual members across the State, and its mission is to reduce hazards to public health and the environment from nuclear power, carbon emissions and other forms of electricity production. Moreover, NC WARN's mission is to promote the use of energy efficiency and renewable energy resources. In furtherance of these missions, NC WARN is a frequent participant in stakeholder events involving Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, the "Companies"), and NC WARN frequently appears before the Commission in rate-increase, resource planning, and other dockets involving the Companies.

2. Most of NC WARN's members reside in the State of North Carolina, and many of those members are customers of the Companies. NC WARN's members are concerned about the impacts of the Companies' Carbon Plan and Integrated Resource Plans upon the environment, their electricity bills, and other matters germane to NC WARN and its organizations purposes.

3. In this proceeding, the Companies make certain proposals that will impact the use of solar energy in North Carolina. NC WARN is an advocate for solar energy, and therefore, the Companies' proposals implicate NC WARN's core organizational mission and interests. NC WARN and its members have a direct and substantial interest in this proceeding and its impact upon their electricity bills and the environment.

4. NC WARN's address is Post Office Box 61051, Durham, North Carolina, 27715-1051.

5. The attorney for NC WARN to whom all correspondence and filings in this docket can be addressed is Matthew D. Quinn, Lewis & Roberts, PLLC, 3700 Glenwood Ave., Ste. 410, Raleigh, North Carolina 27612. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to mdq@lewis-roberts.com.

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

This the 17th day of January, 2024.

/s/ Matthew D. Quinn

Matthew D. Quinn

N.C. Bar No. 40004

Lewis & Roberts, PLLC

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Attorney for NC WARN

VERIFICATION

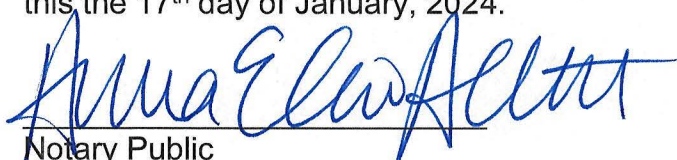
Matthew D. Quinn, being first duly sworn, deposes and says that he is an attorney for NC WARN; that he has read the foregoing Petition to Intervene and that the facts stated therein are true of his personal knowledge, except as to matters and things stated therein on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NC WARN.

This the 17th day of January, 2024.


Matthew D. Quinn

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,
this the 17th day of January, 2024.

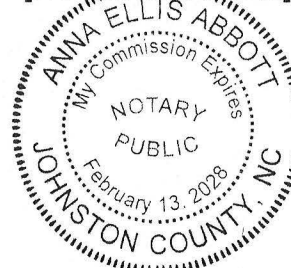

Notary Public


Anna Ellis Abbott

Printed Name of Notary Public

My Commission Expires: 2/13/2028

[NOTARIAL SEAL]



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record in the above-referenced docket by email transmission, or by hand delivery, or by depositing a copy of the same in the United States Mail, postage prepaid.

This the 17th day of January, 2024.

LEWIS & ROBERTS, PLLC

/s/ Matthew D. Quinn
Matthew D. Quinn