

August 19, 2016

FILED

AUG 19 2016

Clerk's Office
N.C. Utilities Commission

OFFICIAL COPY

Chief Clerk
North Carolina Utilities Commission
Dobbs Building, Fifth Floor
430 North Salisbury Street
Raleigh, North Carolina 27602

Re: Docket No. M-100, Sub 145; Rulemaking to Establish Procedure
for Settlements and Stipulated Agreements

VIA HAND DELIVERY

Dear Chief Clerk:

We enclose for filing in the above-referenced matter, on behalf of Carolina Utility Customers Association, Inc. ("CUCA"), an original and 33 copies of CUCA's Petition to Intervene. Kindly date-stamp and return to us via our courier the three additional enclosed copies. Please let me know, at your early convenience, if you have any questions concerning this filing. ✓PSM

Very truly yours,

CRISP, PAGE & CURRIN, L.L.P.


Robert F. Page

Enclosures

cc: Ms. Sharon Miller
Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. M-100, Sub 145

FILED

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*Clerk's Office
N.C. Utilities Commission*

In the Matter of)	
)	
Rulemaking to Establish Procedure for)	Petition of Carolina Utility Customers
Settlements and Stipulated Agreements)	Association, Inc. to Intervene

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, files this Petition pursuant to G.S. 62-72 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") that CUCA be permitted to intervene and participate in the above-captioned proceeding. In support of this petition, CUCA states as follows:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at Suite 210, Trawick Professional Center, 1708 Trawick Road, Raleigh, North Carolina 27604. The names and addresses of its principal officers are:

Chair: Larry E. Law
ITG Brands, LLC
2525 East Market Street
Greensboro, NC 27401

Vice-Chair: Jay Molvie
Pfizer
4300 Oak Park Road
Sanford, NC 27330

Executive Director: Sharon C. Miller
Carolina Utility Customers Association, Inc.
Suite 210, Trawick Professional Center
1708 Trawick Road
Raleigh, NC 27604
Email: smiller@cucainc.org

2. CUCA's attorney, to whom all communications and pleadings should be addressed, is shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Sharon Miller.

Robert F. Page
Crisp, Page & Currin, L.L.P.
4010 Barrett Drive, Suite 205
Raleigh, NC 27609
Telephone: (919) 791-0009
Facsimile: (919) 791-0010
Email: rpage@cpclaw.com

3. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke Energy Carolinas, LLC ("Duke"), Duke Energy Progress ("DEP"), Virginia Electric and Power Company, d/b/a Dominion, North Carolina Power ("DNCP"); Piedmont Natural Gas Company ("Piedmont"), Public Service Company of North Carolina ("PSNC"); and Frontier Natural Gas Company ("Frontier") have been authorized by the Commission to sell electricity and natural gas at retail.

4. CUCA's member companies use electricity and natural gas in the operation of their manufacturing plants. The availability of an adequate supply of electricity and natural gas at a reasonable price is critical to the economic viability of CUCA's member companies. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

5. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

This the 19th day of August, 2016.

CRISP, PAGE & CURRIN, L.L.P.

By:



Robert F. Page
N.C. State Bar No. 3307
4010 Barrett Drive, Suite 205
Raleigh, NC 27609
(919) 791-0009 Telephone
(919) 791-0010 Fax
rpage@cpclaw.com Email

CERTIFICATE OF SERVICE

I, the undersigned counsel for CUCA, do hereby certify that a copy of the foregoing Petition to Intervene was served upon all parties of record in this proceeding, or their legal counsel, by electronic mail and/or U.S. Postal mail.

This the 19th day of August, 2016.



Robert F. Page

ELECTRONIC SERVICE LIST

Mr. John Runkle, Attorney at Law – jrunkle@pricecreek.com

Mr. James H. Jeffries, IV, Moore & Van Allen, PLLC – jimjeffries@mvalaw.com

Mr. Horace P. Payne, Dominion North Carolina Power – horace.p.payne@dom.com

NC WARN – ncwarn@ncwarn.org

Ms. Pia Power, Piedmont Natural Gas Company, Inc. – pia.powers@piedmontng.com

Ms. Candy Paton, Public Service Company of NC, Inc. – CPATON@SCANA.com

Mr. Peter H. Ledford, NC Sustainable Energy Association – peter@energync.org

Ms. Heather Smith, Duke Energy Carolinas, LLC – heather.smith@duke-energy.com

Ms. Mary Lynne Grigg, McGuire Woods, LLP – mgrigg@mcguirewoods.com

Ms. Antoinette Wike, Public Staff-NCUC – antoinette.wike@psncuc.nc.gov

MAIL SERVICE LIST

Frontier Natural Gas Company, LLC
110 PGW Drive
Elkin, NC 28621

Duke Energy Progress, LLC
P.O. Box 1551
Raleigh, NC 27602

STATE OF NORTH CAROLINA VERIFICATION

COUNTY OF WAKE

Sharon C. Miller, being duly sworn, deposes and says that she is the Executive Director of Carolina Utility Customers Association, Inc., the Intervenor herein; that she has read the foregoing Petition of Carolina Utility Customers Association, Inc., to Intervene, and knows the contents thereof, and that the same is true of her own knowledge, except as to those matters herein state upon information and belief, and as to those, she believes them to be true; and that this verified petition be used as an affidavit.

This the 19th day of August, 2016.

Sharon C. Miller
SHARON C. MILLER

SWORN to and subscribed before me,
This the 19th day of August, 2016.

Cynthia L. Ohms
Notary Public

My Commission Expires: 2-3-2020

