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January 26, 2022

Ms. A. Shonta Dunston Chief Clerk North Carolina Utilities Commission 430 N. Salisbury Street Raleigh, NC 27603

RE: In the matter of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC 2022 Integrated Resource Plans and Carbon Plan NCUC Docket E-100, Sub 179

CLEAN POWER SUPPLIERS ASSOCIATION'S

**PETITION TO INTERVENE** 

Dear Ms. Dunston:

On behalf of Clean Power Suppliers Association, we hereby file a Petition to Intervene in the above referenced matter and docket.

Thank you for your assistance with this submittal. Should you have any questions concerning same, please do not hesitate to contact me.

Sincerely,

/o/ Benjamin L. Snowden

Benjamin L. Snowden

pbb

A Pennsylvania Limited Liability Partnership

Minnesota California Colorado District of Columbia Florida Delaware Georgia Illinois Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

## STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

**DOCKET NO. E-100, SUB 179** 

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
	CLEAN POWER SUPPLIERS
Duke Energy Carolinas, LLC, and Duke	ASSOCIATION'S
Energy Progress, LLC, 2022 Integrated	PETITION TO INTERVENE
Resource Plans and Carbon Plan	)

NOW COMES Clean Power Suppliers Association ("CPSA"), a North Carolina nonprofit association, pursuant to the North Carolina Utilities Commission's ("Commission") November 19, 2021 Order Requiring Filing of Carbon Plan and Establishing Procedural Deadlines, and files this Petition to Intervene in the above-referenced docket pursuant to Commission Rules R1-5, R1-7, and R1-19. In support thereof, CPSA shows the following:

- 1. CPSA is a non-profit corporation formed under the laws of North Carolina, with business members doing business in the State. CPSA's members are developers of independent solar generating facilities and include some of the largest developers and owner-operators of utility-scale solar in North and South Carolina. CPSA's mission is to promote a sustainable future through the development of zero-carbon electricity resources in the Carolinas.
- 2. CPSA is actively involved in the implementation of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and goals of the law implemented in a manner consistent with legislative intent.

- 3. CPSA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.
- 4. CPSA's principal office is located at 5310 South Alston Avenue, Building 300, Durham, NC 27713.
- 5. All communications and correspondence related to this proceeding should be addressed to Regulatory Counsel for CPSA as follows:

Benjamin L. Snowden Fox Rothschild LLP 434 Fayetteville Street Suite 2800 Raleigh, NC 27601

Telephone: 919-719-1257

E-mail: BSnowden@foxrothschild.com

6. Pursuant to Commission Rule R1-39, CPSA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, CPSA prays that it be allowed to intervene in this matter.

Respectfully submitted this the 26th day of January 2022.

FOX ROTHSCHILD LLP

Begani L. Surude

Benjamin L. Snowden

North Carolina State Bar No. 51745

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Counsel for Clean Power Suppliers

Association

## **VERIFICATION**

Steven J. Levitas, being first duly sworn, deposes and says: that he is the Chairman of CPSA, that he has read the foregoing Petition to Intervene and knows the contents thereof to be true and correct of his own personal knowledge, except as to those matters therein stated upon information and belief, and as to those, he believes them to be true and correct. In his capacity as Chairman, he is authorized to sign this Verification on behalf of CPSA.

This the nth day of January 2022.

(Name) Steve Levitas

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me, this  $26^{\circ}$  day of January 2022.

Notary Public

Printed Name of Notary Public

My Commission Expires: April 11th 2024

(SEAL)



## **CERTIFICATE OF SERVICE**

I hereby certify that all persons on the Commission's docket service list 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 e-mail transmission with the party's consent.

This the 26th day of January 2022.

Isl Benjamin L. Snowden

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