

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-22, SUB 674

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Application of Virginia Electric and  
Power Company, d/b/a Dominion  
Energy North Carolina, for Approval of  
Renewable Energy and Energy  
Efficiency Portfolio Cost Recovery  
Rider Pursuant to G.S. 62-133.8 and  
Commission Rule R8-67

PETITION TO INTERVENE OF  
CIGFUR I

NOW COMES the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), pursuant to Commission Rules R1-5 and R1-19, and files this petition to intervene. In support of this petition, CIGFUR I respectfully shows as follows:

1. CIGFUR I is an association of non-residential retail customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
2. As ratepayers and purchasers of electric power from DENC, CIGFUR I's member companies have direct, substantial, and pecuniary interests in this proceeding.
3. CIGFUR I's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR I may be contacted by email through its counsel at [cress@bdixon.com](mailto:cress@bdixon.com).
4. No other party is capable of adequately representing or protecting CIGFUR I's interests in this proceeding.

5. CIGFUR I's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress  
Douglas E. Conant  
Bailey & Dixon, LLP  
434 Fayetteville Street, Suite 2500  
P.O. Box 1351 (zip 27602)  
Raleigh, NC 27601  
(919) 607-6055  
[ccress@bdixon.com](mailto:ccress@bdixon.com)  
[dconant@bdixon.com](mailto:dconant@bdixon.com)

6. Pursuant to Commission Rule R1-39, CIGFUR I agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR I respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 25<sup>th</sup> day of August, 2023.

**BAILEY & DIXON, LLP**

/s/ Douglas E. Conant  
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*Attorneys for CIGFUR I*

VERIFICATION

Douglas E. Conant, first being duly sworn, deposes and says as follows: that he is one of the attorneys for CIGFUR I; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters or 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 CIGFUR I.

This the 25th day of August, 2023.

*[Handwritten signature of Douglas E. Conant]*

Douglas E. Conant

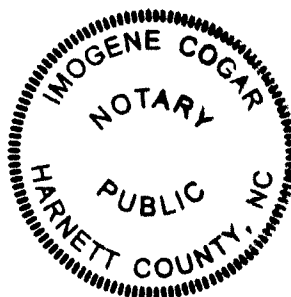
STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

This 25th day of August, 2023, by Douglas E. Conant.

*[Handwritten signature of Imogene Cogar]*  
Notary Public

*[Handwritten signature of Imogene Cogar]*  
Typed or Printed Notary Public Name



My Commission Expires: 10/1/2024

**CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR I hereby certifies that he caused the foregoing *Petition to Intervene of CIGFUR I* to be served upon all parties of record to this proceeding, as set forth in the Service List maintained by the Chief Clerk of the NCUC, by electronic mail.

This the 25<sup>th</sup> day of August, 2023.

/s/ Douglas E. Conant  
Douglas E. Conant