

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. EMP-105, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of the Application of
Friesian Holdings, LLC for a Certificate
of Public Convenience and Necessity

PETITION TO INTERVENE

On May 15, 2019, Friesian Holdings, LLC (“Friesian”) filed an application for a certificate of public convenience and necessity (“CPCN”) for a 70-MW_{AC} solar photovoltaic facility in Scotland County, North Carolina (“Project”). Therein, Friesian indicated that it anticipated execution of a Project-related purchase power agreement (“PPA”) between it and North Carolina Electric Membership Corporation (“NCEMC”). The PPA has now been executed.

On June 13, 2019, the North Carolina Utilities Commission (“Commission”) issued an *Order Scheduling Hearings, Requiring Filing of Testimony, Establishing Procedural Guidelines, and Requiring Public Notice* (“Scheduling Order”), in which the Commission ordered that any person having an interest in this proceeding may file a petition to intervene on or before August 5, 2019.

In accordance with the Scheduling Order, NCEMC files this Petition to Intervene and requests that it be permitted to intervene and participate in the above-captioned proceeding and shows unto the Commission as follows:

1. NCEMC’s attorneys, to whom all communications and pleadings should be addressed are:

Richard M. Feathers
Senior Vice President and General Counsel
North Carolina Electric Membership Corporation
Post Office Box 27306
Raleigh, NC 27611
Telephone: (919) 875-3121
Email: rick.feathers@ncemcs.com

Michael D. Youth
Government & Regulatory Affairs Counsel
Telephone: (919) 875-3060
Email: michael.youth@ncemcs.com

2. NCEMC is a generation and transmission cooperative responsible for the power supply of its 26 member distribution cooperatives throughout the State of North Carolina. NCEMC purchases power and energy pursuant to wholesale contracts from Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Dominion Energy North Carolina and others, including facilities similar to Friesian, to supply its members. These members, in turn, supply power to their members, the end-use retail consumers. NCEMC also owns and operates electric generation resources, some of which are fueled by natural gas purchased from entities subject to Commission jurisdiction. As Friesian's counterparty on the Project PPA, no other party can adequately represent NCEMC's interests and NCEMC's participation would be in the public interest.

3. NCEMC agrees to accept electronic service of all filings in the docket.

4. NCEMC asks that the Commission make it a party to this proceeding with the rights typically applicable to intervenors.

WHEREFORE, NCEMC requests that its Petition to Intervene be granted.

This the 21st day of June, 2019

**NORTH CAROLINA ELECTRIC
MEMBERSHIP CORPORATION**

By: 

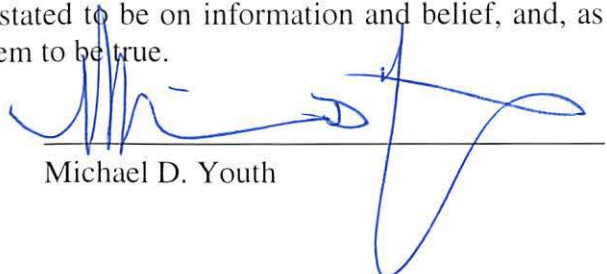
Michael D. Youth
Government & Regulatory Affairs Counsel
Post Office Box 27306
Raleigh, North Carolina 27611
Telephone: (919) 875-3060
Email: michael.youth@ncemes.com

STATE OF NORTH CAROLINA

COUNTY OF WAKE

Michael D. Youth, having been first duly sworn, deposes and says:

1. He is a Government & Regulatory Affairs Counsel for North Carolina Electric Membership Corporation.
2. He has read the foregoing Petition to Intervene and knows its contents.
3. The matters stated in this instrument are true of his knowledge, except as to those matters that are stated to be on information and belief, and, as to those matters, he believes them to be true.



Michael D. Youth

Sworn to and subscribed before me
this 21st day of June 2019.



Notary Public
Brenda Lynam

My Commission Expires: 11/18/2023

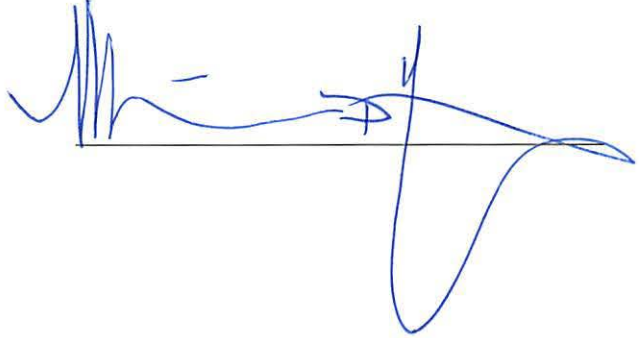
[SEAL]



CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document has been served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

This the 21st day of June 2019.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned to the right of the date.