

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET No. E-100, SUB 175**

<b>In the Matter of:</b>	)	
<b>Biennial Determination of Avoided Cost</b>	)	<b>PETITION OF CCEBA TO</b>
<b>Rates for Electric Utility Purchases from</b>	)	<b>INTERVENE</b>
<b>Qualifying Facilities - 2021</b>	)	

**CCEBA’S PETITION TO INTERVENE**

NOW COMES the Carolinas Clean Energy Business Association (“CCEBA”), pursuant to Rules R1-5, R1-7, and R1-19, and the Commission’s August 13, 2021 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* and petitions to intervene in the above-captioned docket. In support of its Petition, CCEBA shows the Commission the following:

1. CCEBA is a non-profit organization formed under the laws of North Carolina. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas.

2. CCEBA has appeared as an intervenor in multiple dockets in North Carolina and South Carolina under its current name, and under its prior name: North

Carolina Clean Energy Business Alliance. These dockets include dockets addressing avoided cost filings by both Duke Energy and Dominion Energy and their subsidiaries.

3. CCEBA's participation in this proceeding will benefit the Commission by providing critical analysis of any proposed revisions along with deep industry knowledge and experience.

4. CCEBA's address is 811 Ninth Street, Suite 120-158, Durham, NC 27705.

All correspondence related to this proceeding should be addressed to counsel:

John D. Burns  
General Counsel  
811 Ninth Street  
Suite 120-158  
Durham, NC 27705  
(919) 306-6906  
[counsel@carolinmasceba.com](mailto:counsel@carolinmasceba.com)

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

WHEREFORE, for the reasons stated, CCEBA respectfully requests that it be allowed to intervene in this matter.

Respectfully submitted this 12<sup>th</sup> day of November, 2021.

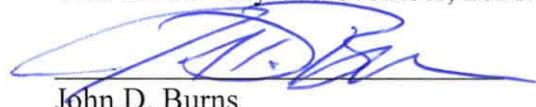
CAROLINAS CLEAN ENERGY BUSINESS  
ASSOCIATION

By:           /s/ John D. Burns            
John D. Burns  
General Counsel  
NC Bar No. 24152  
811 Ninth Street  
Suite 120-158  
Durham, NC 27705  
(919) 306-6906  
[counsel@carolinmasceba.com](mailto:counsel@carolinmasceba.com)

VERIFICATION

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

This the 12<sup>th</sup> day of November, 2021.



John D. Burns

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,  
this the 8<sup>th</sup> day of November, 2021.

[NOTARIAL SEAL]

  
Notary Public

John A. Testino  
Printed Name of Notary Public

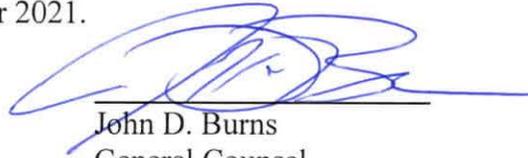
My Commission Expires: March 18, 2023



**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail, deposited in the U.S. Mail, postage pre-paid, or by email transmission with the party's consent.

This the 12<sup>th</sup> day of November 2021.



John D. Burns  
General Counsel  
NC Bar No. 24152  
811 Ninth Street  
Suite 120-158  
Durham, NC 27705  
(919) 306-6906  
[counsel@carolinmasceba.com](mailto:counsel@carolinmasceba.com)