

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-22, SUB 674
DOCKET NO. E-22, SUB 675
DOCKET NO. E-22, SUB 676

DOCKET NO. E-22, SUB 674)
)
In the Matter of)
Application by Virginia Electric and)
Power Company, d/b/a Dominion)
Energy North Carolina, for Approval of)
Renewable Energy and Energy)
Efficiency Portfolio Standard Cost)
Recovery Rider Pursuant to G.S. 62-)
133.8 and Commission Rule R8-67)
)
DOCKET NO. E-22, SUB 675)
)
In the Matter of)
Application by Virginia Electric and)
Power Company, d/b/a Dominion)
Energy North Carolina, for Authority to)
Adjust its Electric Rates and Charges)
and Revise its Fuel Factor Pursuant to)
N.C. Gen. Stat. § 62-133.2 and NCUC)
Rule R8-55)
)
DOCKET NO. E-22, SUB 676)
)
In the Matter of)
Application of Virginia Electric and)
Power Company, d/b/a Dominion)
Energy North Carolina, for Authority to)
Adjust its Electric Rates and Charges)
Pursuant to N.C.G.S. § 62-133.9 and)
Commission Rule R8-69)

CUCA’S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina
Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its

undersigned counsel, hereby respectfully petitions to intervene in the above-captioned dockets. In support of the petition, Petitioner provides the following information:

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 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and addresses of its principal officers are

Chair: David J. Lyons
Gerdau Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Executive Director: Kevin N. Martin
Carolina Utility Customers Association, Inc.
8386 Six Forks Rd, Suite 103
Raleigh, NC 27615
kmartin@cucainc.org

3. CUCA's attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Kevin Martin:

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Matthew B. Tynan
Christopher B. Dodd
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4. 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 Dominion Energy North Carolina (“DENC”) has been authorized by the Commission to sell electricity at retail.

5. CUCA’s member companies use electricity sold by DENC in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA’s member companies. The issues arising in these proceedings will impact both the adequacy of supply and the charges associated with DENC’s sale of electric power to CUCA members.

6. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceedings, an interest which cannot be adequately represented by other parties, and should be permitted to intervene and participate as a party to the proceedings.

7. CUCA agrees to accept electronic service of all filings in these proceedings.

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

Respectfully submitted, this 23rd day of August, 2023.

/s/ Christopher B. Dodd

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*Attorneys for Carolina Utility Customers
Association, Inc.*

VERIFICATION

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and thing 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 Carolina Utility Customers Association, Inc..

This the 16 day of August, 2023.

Sworn to and subscribed before me
this 16th day of August, 2023.

Notary Public

Jennifer B. Hollerung
NOTARY PUBLIC
Wake County, NC
My Commission Expires June 07, 2026

Commission Expires: June 7, 2026

Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in this proceeding by electronic mail.

This the 23rd day of August, 2023.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

/s/ Christopher B. Dodd