

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 179

DOCKET NO. E-2, SUB 1297

DOCKET NO. E-7, SUB 1278

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 179)

)

In the Matter of:)

Duke Energy Progress, LLC, and Duke)

Energy Carolinas, LLC, 2022 Biennial)

Integrated Resource Plans and Carbon)

Plan)

)

DOCKET NO. E-2, SUB 1297)

DOCKET NO. E-7, SUB 1268)

)

In the Matter of:)

Duke Energy Progress, LLC, and Duke)

Energy Carolinas, LLC, 2022 Solar)

Procurement Pursuant to Session Law)

2021-165, Section 2(c))

)

CCEBA'S MOTION FOR PERMISSION TO INTERVENE OUT OF TIME

NOW COMES the Carolinas Clean Energy Business Association ("CCEBA"), pursuant to Rules R1-5, R1-7, and R1-19, and moves the Commission to allow its petition to intervene out of time in the above-captioned dockets E-2, Sub 1297 and E-7, Sub 1268. In support of its Motion and 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. On January 31, 2022, the Commission entered an Order granting CCEBA's intervention in Docket No. E-100, Sub 179.

3. The Commission's March 11, 2022, Order Opening Separate Dockets and Establishing Procedural Deadlines required parties to intervene and file comments on or before March 28, 2022. On March 28, 2022, being previously admitted as an Intervenor in Docket E-100, Sub 179, CCEBA joined the Clean Power Suppliers Association ("CPSA") in filing Joint Comments on the 2022 Procurement filings previously submitted by Duke Energy Progress, LLC and Duke Energy Carolinas, LLC. Through an inadvertent oversight, CCEBA failed to petition to Intervene in E-2, Sub 1297 and E-7, Sub 1268 before March 28, 2022.

4. CCEBA does not seek to delay any proceedings in these dockets, but only requests the Commission to allow its intervention one day out of time.

5. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its current name, and under its prior name: North Carolina Clean Energy Business Alliance.

6. CCEBA is already in intervenor in the Carbon Plan docket and numerous other dockets relating to the future of electricity markets, generation, transmission, and

interconnection in North Carolina. CCEBA's members include companies which intent to participate in any 2022 solar procurement ordered by the Commission under House Bill 951 and seeks to add the voices and expertise of its members to these discussions.

7. 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@carolinasceba.com

8. 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 the Commission allow its Intervention one day out of time, and accept as filed on behalf of CCEBA the Joint Comments filed on March 28, 2022 with the CPSA.

Respectfully submitted this 29th day of March, 2022.

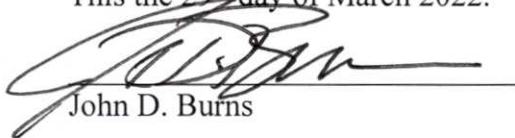
CAROLINAS CLEAN ENERGY BUSINESS
ASSOCIATION

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@carolinasceba.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 stated 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.

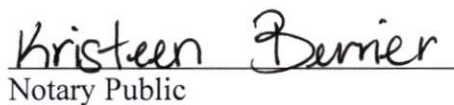
This the 29th day of March 2022.

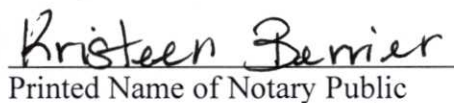

John D. Burns

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,
this the 29th day of March 2022.

[NOTARIAL SEAL]


Notary Public


Printed Name of Notary Public

My Commission Expires: 12-27-2026



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 29^h day of March 2022.

/s/ John D. Burns
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