

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 165

| | | |
|---------------------------------------------|---|------------------------------|
| In the Matter of: |) | |
| 2020 Biennial Integrated Resource Plans and |) | <u>PETITION TO INTERVENE</u> |
| Related 2020 REPS Compliance Plans |) | |
| |) | |

NOW COMES NC WARN, Inc. ("NC WARN") and Center for Biological Diversity ("CBD" or the "Center"), by and through undersigned counsel, pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7 and R1-19, and respectfully petitions to intervene and participate in the above-captioned proceeding. In support of this petition, NC WARN and CBD state as follows:

1. NC WARN is a not-for-profit corporation organized and existing under the laws of the State of North Carolina. NC WARN has approximately one thousand individual members across the State, and its mission is to reduce hazards to public health and the environment from nuclear power, carbon emissions and other forms of electricity production. Moreover, NC WARN's mission is to promote the use of energy efficiency and renewable energy resources. In furtherance of these missions, NC WARN is a frequent participant in stakeholder events involving Duke Energy Carolinas LLC and Duke Energy Progress, LLC, and NC WARN frequently appears before the Commission in other dockets involving energy planning issues.

2. Most of NC WARN's members reside in the State of North Carolina, and many of those members are customers of Duke Energy Progress, LLC or

Duke Energy Carolinas LLC. NC WARN's members are concerned about the impacts of the planning and projection described in the various Integrated Resource Plans filed by the public utilities in the above-captioned docket.

3. The planning and projections described in the above-captioned docket implicates NC WARN's core organizational missions and interests. NC WARN and its members have a direct and substantial interest in this proceeding and its impact upon their electricity bills and the environment.

4. NC WARN's address is Post Office Box 61051, Durham, North Carolina, 27715-1051.

5. The Center for Biological Diversity is a national, non-profit conservation organization with offices throughout the United States, including North Carolina. The Center has more than 1.5 million members and online activists, including 33,681 members in North Carolina – many of whom are customers of Duke Energy Progress, LLC or Duke Energy Carolinas, LLC – who both care about the state's urgent need to expedite its renewable energy transition and the protection of human health, the natural environmental, and species from the ravages of the climate emergency and other environmental harms.

6. In pursuit of this mission, the Center has participated in the formulation of the North Carolina Clean Energy Plan and has intervened in Commission proceedings implicating these issues. The Center and its members are concerned about the impacts of the planning and projections described in the various Integrated Resource Plans filed by the public utilities in the above-

captioned docket, which implicate the Center and its members' interests. The Center and its members have a direct and substantial interest in this proceeding and its impact upon their electricity bills, the environment, and the climate.

7. The Center's North Carolina address is P.O. Box 18223, Asheville, NC 28814.

8. The attorneys for NC WARN and the Center to whom all correspondence and filings in this docket can be addressed are:

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Anchun Jean Su (*pro hac vice* application pending)
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9. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to the above-mentioned attorneys at their respective email addresses.

WHEREFORE, NC WARN and the Center respectfully request that they be allowed to intervene in this matter.

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This the 16th day of October, 2020.

/s/ Matthew D. Quinn

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/s/ Anchun Jean Su

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Attorneys for Petitioners

VERIFICATION

I, James Warren, Executive Director of NC WARN, verify that the contents of the foregoing Petition to Intervene related to NC WARN are true to the best of my knowledge and belief. I am authorized to execute this Verification on behalf of NC WARN.

This the 15th day of October, 2020.



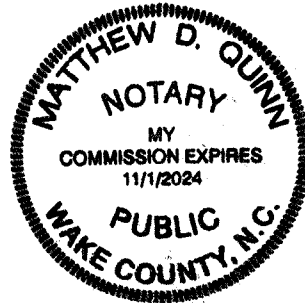
James Warren

Sworn to and subscribed before me,
this the 15th day of October, 2020.



Notary Public

My commission expires: 11/1/2024



VERIFICATION

I, Howard Crystal, Energy Justice Program Legal Director of the Center for Biological Diversity, verify that the contents of the foregoing Petition to Intervene related to the Center for Biological Diversity are true to the best of my knowledge and belief. I am authorized to execute this Verification on behalf of the Center for Biological Diversity.

This the 12th day of October, 2020.



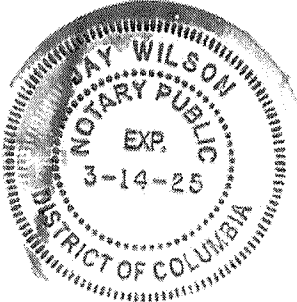
Howard Crystal

Sworn to and subscribed before me,
this the 12th day of October, 2020.



Notary Public

My commission expires: 03-14-2025



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record by email transmission.

This the 16th day of October, 2020.

/s/ Matthew D. Quinn

Matthew D. Quinn