

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

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)))))	<u>PETITION TO INTERVENE</u> <u>BY</u> <u>ENVIRONMENTAL WORKING GROUP</u>
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Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7 and R1-19, the Environmental Working Group (“EWG”), through undersigned counsel, hereby petitions to intervene and participate in the above-captioned docket. In support of this petition, EWG states as follows:

1. EWG is a 501(c)(3) non-profit, non-partisan organization that works to empower people to live healthier lives in a healthier environment. EWG does this, in part, by creating and sharing research reports and consumer guides that help people educate themselves about the food they consume, the products they buy, and the companies they support so that everyone can make safer and more informed choices. In furtherance of its mission, EWG engages in research and policy advocacy on a broad range of issues related to state and federal energy policy, climate change, renewable energy, toxic chemicals, food and agriculture, water and air pollution, and public health. EWG’s regulatory focus on energy policy has included rate design and public policy issues related to consumer use and access to solar and other clean energy resources.

2. EWG has a strong presence in North Carolina. EWG’s supporters engage with the organization in a variety of ways online. Across our three major social media platforms, we have approximately 1 million followers: 63,000 on Twitter, 231,000 on Instagram, and 720,000 “likes” on Facebook. Our websites, which host our consumer-focused databases and guides, are visited 27

million times yearly by 16 million users, including 422,090 from North Carolina. To learn more about our supporters' concerns and opinions, we email a survey to our supporters at least once a month. More than 3 million supporters have signed up to receive these emails, of which 435,000 are currently active, including 9,938 supporters from North Carolina.

3. EWG has a history of working with North Carolina organizations to protect the environment and health of all North Carolinians. For example, since 2016, EWG has partnered with Waterkeeper Alliance to expose the location of concentrated animal feeding operations in North Carolina. Through detailed geospatial maps relied upon by North Carolina farmers, residents, lawmakers, and environmentalists, EWG exposes the concentrated animal feeding operations, or CAFOs, which produce 10 billion gallons of bacteria-laden, liquefied hog waste per year. Likewise, EWG has an ongoing mapping project that documents publicly known perfluoroalkyl and polyfluoroalkyl substances ("PFAS") pollution in North Carolina's public water systems and on or near military bases, airports, industrial plants and dumps, and firefighter training sites. North Carolina's Cape Fear River basin is a source of PFAS contamination, plagued by the dumping of PFAS chemicals in the river for more than four decades by DuPont, and its spin-off, Chemours. EWG, working with Clean Cape Fear, has lobbied in Congress for better drinking standards and water cleanup funding to address the PFAS crisis across the country and in North Carolina. Also, EWG is a founding member of the Duke Energy Accountability Coalition that consists of advocacy organizations in each state where Duke Energy operates a monopoly utility subsidiary, including NCWARN, 350 Triangle, 350 Charlotte, and Appalachian Voices based in North Carolina. Moreover, EWG has published several reports and articles chronicling Duke Energy's operations and business plans. EWG policy and influence on North Carolina environmental health matters is

also informed by its board member and Chapel Hill, North Carolina resident, and former secretary of the North Carolina Department of Environmental and Natural Resources, William Ross, Jr.

4. Through its supporters, who are both customers and non-customers of North Carolina's regulated electric utilities, EWG has a significant interest in the outcome of Duke Energy's Proposed Biennial Integrated Resource Plans and Carbon Plan. EWG is interested in ensuring that all proposed plans will avoid unequal increase of retail rates, continued reliance on natural gas, and minimal incorporation of distributed energy resources. EWG is also interested in ensuring the implementation of meaningful investments in the critically needed renewable energy transition, including encouraging residential and commercial customers to make critical investments in Distributed Energy Resources.

5. Duke Energy Progress, LLC and Duke Energy Carolinas, LLC's proposed plan directly and significantly affects EWG's mission, interests, and members, who support equitable rate structures and investments that will advance the widespread adoption of distributed renewable energy and energy efficiency measures. Moreover, EWG opposes any plan designed to perpetuate fossil-fuel-generated electricity, which adversely impacts public health and safety, air quality, species, the environment, and the climate crisis.

6. EWG seeks to intervene in this proceeding to advocate for a plan that will comply with the statutory mandates of House Bill 951 and ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding Duke's Proposed Biennial Integrated Resource Plans and Carbon Plan.

7. The address of the EWG's headquarters office is 1250 Street NW, Suite 1000, Washington, DC 20005.

8. The attorneys for EWG to whom all correspondence and filings in this docket should be addressed are:

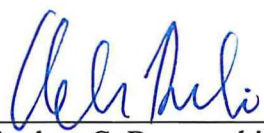
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9. The above counsel for EWG, pursuant to Commission Rule RI-39, agree to electronic service of all pleadings and other filings in this docket.

WHEREFORE, for the foregoing reasons, EWG respectfully requests that the Commission grant its request that it be permitted to intervene and participate fully as a party to this proceeding.

Respectfully submitted this 13 day of June, 2022.

By: 
Andrea C. Bonvecchio
N.C. State Bar No. 56438
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VERIFICATION

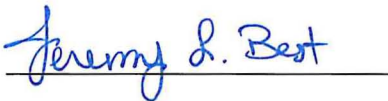
I, Andrea C. Bonvecchio, verify that the contents of the foregoing *Petition to Intervene by Environmental Working Group* are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of the Environmental Working Group.



ANDREA C. BONVECCHIO

Sworn to and subscribe before me

This the 13th day of June, 2022



Notary Public



Commission expires: 8/11/2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Petition to Intervene* by *Environmental Working Group* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 13 day of June, 2022.

LAW OFFICE OF F. BRYAN BRICE, JR.

By: 

Andrea C. Bonvecchio