

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

|                                     |   |                      |
|-------------------------------------|---|----------------------|
| In the Matter of                    | ) |                      |
| Biennial Consolidated Carbon Plan   | ) |                      |
| and Integrated Resource Plans of    | ) | MOTION FOR ADMISSION |
| Duke Energy Carolinas, LLC, and     | ) | <i>PRO HAC VICE</i>  |
| Duke Energy Progress, LLC,          | ) |                      |
| Pursuant to N.C.G.S. § 62-110.9 and | ) |                      |
| § 62-110.1(c)                       | ) |                      |

NOW COMES the Movant, Clean Energy Buyers Association (“CEBA”) through its undersigned attorneys of record in this cause, and pursuant to N.C. Gen. Stat. § 84-4.1, respectfully moves the North Carolina Utilities Commission (“the Commission”) for an Order granting privileges to practice *pro hac vice* to the attorney of the law firm hereinafter listed in the above captioned docket. In support of this Motion, the Movant respectfully shows unto the Commission the following:

1. The full name and address of the counsel requesting privileges to practice *pro hac vice* is as follows:

Elizabeth Haskins, Esq.  
Nelson Mullins Riley & Scarborough LLP  
3751 Grissom Parkway, Suite 300  
Myrtle Beach, SC 29577  
Telephone: (843) 946-5673  
Facsimile: (843) 448-3437  
elizabeth.haskins@nelsonmullins.com

2. The aforementioned attorney is licensed to practice in the State of South Carolina, is engaged in the active practice of law within the state, and is a member in good standing of the Bar of the State of South Carolina.

3. The undersigned attorney certifies that Elizabeth Haskins and the law firm of Nelson Mullins Riley & Scarborough LLP have been retained to represent CEBA in the above-captioned proceeding before the Commission, together with the undersigned member of the North Carolina State Bar, attorney Joseph W. Eason of the law firm of Nelson, Mullins, Riley & Scarborough LLP of Raleigh, North Carolina.

4. Attached hereto as Exhibit A is an Affidavit signed by the attorney seeking admission. The Affidavit states that the attorney is regularly admitted and in good standing to practice in the courts of record in the State of South Carolina; will continue to represent CEBA in the above-captioned proceeding until the final determination thereof, unless permitted to withdraw sooner by order of the Commission; and agrees to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice, the Commission, and the North Carolina State Bar in all respects as if a regularly admitted and licensed member of the Bar of North Carolina in good standing. Movant adopts by reference and incorporates herein the contents of Exhibit A.

5. The undersigned is informed and believes that the Bar of the State of South Carolina grants like privileges to practice *pro hac vice* to

members of the Bar of North Carolina in good standing, as recited in Exhibit A.

6. Attached hereto as Exhibit B is a letter from Priya Barua, Director of Market and Policy Innovation, affirming that CEBA has retained Ms. Haskins to represent its interests in this matter.

7. The undersigned is a licensed attorney in the State of North Carolina, and has been associated with the foregoing attorney seeking *pro hac vice* admission, and will be personally appearing in the above-captioned proceeding before the Commission. The undersigned attorney resides in the State of North Carolina and is duly and legally admitted to practice in the General Court of Justice of North Carolina. Service on the undersigned resident attorney may be had in all matters connected with these legal proceedings, or any disciplinary matter, with the same effect as if personally made in this State on the foreign attorney seeking to practice before this Commission *pro hac vice*.

WHEREFORE, CEBA and the undersigned attorney respectfully request that Elizabeth Haskins of Nelson Mullins Riley & Scarborough LLP be permitted to appear *pro hac vice* before the North Carolina Utilities Commission in the above-captioned proceeding and that the Commission enter an order granting such relief.

This the 29<sup>th</sup> day of November, 2023.

  
\_\_\_\_\_  
Joseph W. Eason  
N.C. Bar. No. 7699  
Nelson, Mullins, Riley & Scarborough  
LLP  
301 Hillsborough Street, Suite 1400  
Raleigh, NC 27603  
joe.eason@nelsonmullins.com

*Attorneys for Clean Energy Buyers  
Association*

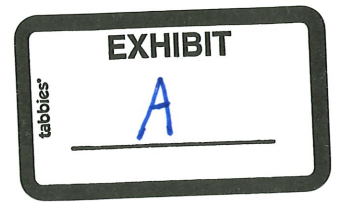
## CERTIFICATE OF SERVICE

The undersigned attorney for Clean Energy Buyers Association hereby certifies that he served the foregoing upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

This 29<sup>th</sup> day of November, 2023.

  
\_\_\_\_\_  
Joseph W. Eason





STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of )  
Biennial Consolidated Carbon Plan )  
and Integrated Resource Plans of )  
Duke Energy Carolinas, LLC, and )  
Duke Energy Progress, LLC, )  
Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

AFFIDAVIT OF ELIZABETH HASKINS

I, Elizabeth Haskins, being first duly sworn, do hereby state as follows:

1. My name is Elizabeth Haskins, and my mailing address is Nelson Mullins Riley & Scarborough LLP, 3751 Grissom Parkway, Suite 300, Myrtle Beach, SC 29577. I am regularly admitted to practice law before the courts of record in the State of South Carolina (No. 105384).

2. I have been retained by Clean Energy Buyers Association ("CEBA") to represent it in connection with the proceeding referenced above pending before the North Carolina Utilities Commission ("the Commission").

3. Unless permitted to withdraw sooner by Order of the Commission, I will, if granted leave to practice *pro hac vice*, represent CEBA in the aforementioned proceeding until the final determination thereof. With reference to all matters incident to such proceeding, I agree that I shall be

subject to the orders and amenable to the disciplinary action and civil jurisdiction of the Commission, the General Court of Justice of North Carolina and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. The South Carolina Bar grants privileges to practice *pro hac vice* such as those that I am requesting to members of the Bar of North Carolina in good standing.

5. I have associated with local attorney, Joseph W. Eason, who will personally appear with me in the above-referenced proceeding. Said attorney is a resident of the State of North Carolina and is duly and legally admitted to practice in the General Court of Justice of North Carolina, and is a member in good standing of the North Carolina State Bar. Service may be made upon Joseph W. Eason of Nelson, Mullins, Riley & Scarborough, LLP, at 301 Hillsborough Street, Suite 1400, Raleigh, North Carolina 27603, in all matters connected with the above-referenced proceeding, or any disciplinary matter, with the same effect as if personally made on me within the State of North Carolina.

This the 29<sup>th</sup> day of November, 2023.



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Elizabeth Haskins

STATE OF SOUTH CAROLINA )

COUNTY OF HORRY )

Personally appeared before me this day, Elizabeth Haskins, who being first duly sworn, deposed and said that she had read the foregoing Affidavit and knows the contents thereof; that the contents of same are true of her own knowledge except as to those matters and things stated therein upon information and belief, and as to those she believes them to be true.

Witness my hand and notarial seal this 29<sup>th</sup> day of November, 2023.

*S. Tereasa Nelson*  
Notary Public

My Commission Expires: 03/06/2029



S. Tereasa Nelson  
NOTARY PUBLIC  
State of South Carolina  
My Commission Expires  
March 6, 2029



STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

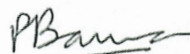
In the Matter of )  
Biennial Consolidated Carbon Plan )  
and Integrated Resource Plans of )  
Duke Energy Carolinas, LLC, and )  
Duke Energy Progress, LLC, )  
Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

STATEMENT OF CLEAN ENERGY BUYERS ASSOCIATION

I, Priya Barua, of Clean Energy Buyers Association do hereby state that Clean Energy Buyers Association has retained Elizabeth Haskins of the law firm of Nelson Mullins Riley & Scarborough LLP to represent it before the North Carolina Utilities Commission in the above-captioned matter. Ms. Haskins will appear in association with Joseph W. Eason of the law firm of Nelson Mullins Riley & Scarborough LLP.

This 28<sup>th</sup> day of November, 2023.

CLEAN ENERGY BUYERS ASSOCIATION



Priya Barua

STATE OF Virginia  
COUNTY OF Fairfax

Personally appeared before me this day, Nov 28<sup>th</sup> 2023 who being first duly sworn, deposed and said that she has read the foregoing Affidavit and knows the contents thereof, that the contents of same are true of her own knowledge except as to those matters and things stated therein upon information and belief, and as to those she believes them to be true.

This 28 day of November, 2023.



Zander Olsen Babiev  
Commonwealth of Virginia  
Notary Public  
Commission No. 7821900  
My Commission Expires 1/31/2025

[Signature]  
Notary Public

My commission expires 01/31/2025