

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. M-100, SUB 164

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Consideration of the Federal Funding
Available Under the Infrastructure
Investment and Jobs Act

PETITION TO INTERVENE OF
CIGFUR I, II, AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to Commission Rules R1-5 and R1-19 and the Commission's February 1, 2022 Order Allowing Comments Regarding Federal Funding for Utility Service in North Carolina, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

1. CIGFUR I is an association of large customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
2. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP).
3. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC).
4. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at cress@bdixon.com.

5. As purchasers of electric power from DENC, DEP, and DEC who operate numerous manufacturing facilities and employ thousands of people throughout North Carolina, the member companies of CIGFUR I, II, and III, respectively, have direct, substantial and pecuniary interests in this proceeding. Moreover, energy security and the adequate, reliable supply of electricity and natural gas at reasonable prices are vital to CIGFUR member companies' ability to maintain competitive operations in this State.
6. CIGFUR's participation in these dockets will bring the important perspective of large, high load factor industrial customers of DENC, DEP, and DEC, particularly with regard to prioritizing and maximizing the amount of federal funding sought and made available for the benefit of electric system operations and/or for the direct financial interest of ratepayers.
7. CIGFUR's attorney, to whom all communications and pleadings should be addressed, is shown below:

Christina D. Cress
434 Fayetteville Street, Suite 2500
P.O. Box 1351 (zip 27602)
Raleigh, NC 27601
(919) 607-6055
ccress@bdixon.com

8. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR should be permitted to intervene and participate as a party to this proceeding.
9. Pursuant to Commission Rule R1-39, CIGFUR agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 28th day of February, 2022.

BAILEY & DIXON, LLP

/s/ Christina D. Cress

Christina D. Cress

N.C. State Bar No. 45963

434 Fayetteville St., Suite 2500

P.O. Box 1351 (zip 27602)

Raleigh, NC 27601

(919) 607-6055

ccress@bdixon.com

Attorneys for CIGFUR

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says as follows: that she is the attorney for CIGFUR; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters or things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR.

This the 28th day of February, 2022.

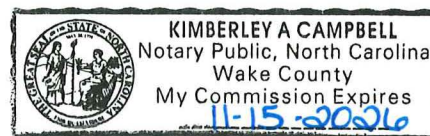
Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 28th day of February, 2022, by Christina D. Cress.

Notary Public



Kimberley A. Campbell
Typed or Printed Notary Public Name

My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she caused the foregoing *Petition to Intervene* to be served upon all parties of record to this proceeding by electronic mail.

This the 28th day of February, 2022.

/s/ Christina D. Cress
Christina D. Cress

OFFICIAL COPY

Feb 28 2022