

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-7, Sub 1289

DOCKET NO. E-2, Sub 1314

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Petition of Duke Energy Progress, LLC, and)	PETITION TO
Duke Energy Carolinas, LLC, Requesting)	INTERVENE OF
Approval of Green Source Advantage Choice)	CLEAN ENERGY
Program and Rider GSAC)	BUYERS ASSOCIATION

NOW COMES the Clean Energy Buyers Association, formerly known as the Renewable Energy Buyers Alliance, pursuant to Rules R1-5, R1-7 and R1-19 of the Rules and Regulations of the North Carolina Utilities Commission, and respectfully moves to intervene in and be joined as a party to the above-captioned proceeding. In support of its petition, Clean Energy Buyers Association states:

1. Clean Energy Buyers Association is a business association representing a diverse membership that directly do business within the State of North Carolina,¹ and was organized to accomplish the purposes of promoting and advocating public policy positions supportive of the development of renewable electric power generation throughout the United States, including North Carolina. With more than 370 members during the 1st quarter of 2023, including some of the largest buyers of renewable energy that do business within North Carolina, Clean Energy Buyers Association monitors and participates in policy-making proceedings and activities in this State and other states, as well as before Congress and various federal agencies of the United States.

¹ See representative members of Clean Energy Buyers Association at <https://cebayers.org/about/ceba-members/>

2. The members of Clean Energy Buyers Association who conduct business operations within North Carolina and those operations, as well as the corporate policies of each member to support the development of renewable energy, will be affected by the issues and policies which will be the subject of these proceedings. Through its members, Clean Energy Buyers Association has direct and substantial interests in the matters at issue in this proceeding, and should be permitted to intervene and participate as a party to this proceeding.

3. Clean Energy Buyers Association has appeared previously as an intervenor in proceedings pending before this Commission namely Duke's Carbon Plan, Referred to as Docket E-100, SUB 179. Clean Energy Buyers Association's participation as a party to this proceeding will benefit the Commission by providing an independent analysis of proposals pertaining to voluntary renewable energy customer programs, whether put forward by DEC, DEP or a third-party, from the perspective of businesses which are committed to supporting decarbonization of the electric industry and accordingly purchase large quantities of renewable energy. None of the current intervenors adequately represent the interests of Clean Energy Buyers Association's unique membership.

4. Clean Energy Buyers Association's business address is 1425 K Street NW, Suite 1110, in Washington, District of Columbia 20005. All correspondence related to this proceeding should be addressed to:

Joseph W. Eason, Esq.
N.C. State Bar No. 7699
Nelson, Mullins, Riley & Scarborough LLP
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
Telephone: (919) 329-3807
Facsimile: (919) 329-3799

joe.eason@nelsonmullins.com

and to:

Weston Adams, Esq.
N.C. State Bar No. 18659
Nelson Mullins Riley & Scarborough LLP
1320 Main Street
Meridian 17th Floor
Post Office Box 11070
Columbia, SC 29211-1070
Telephone: (803) 255-9708
Facsimile: (803) 256-7500
weston.adams@nelsonmullins.com

and also to:

Jamey H. Goldin, Esq*
Nelson Mullins Riley & Scarborough LLP
Liberty Center, Suite 600
151 Meeting Street
Charleston, SC 29401
Telephone: (843) 534-4116
Facsimile: (843) 722-8700
jamey.goldin@nelsonmullins.com

*Of Counsel

5. Pursuant to Commission Rule R1-39, the Clean Energy Buyers Association agrees through its undersigned counsel to electronic service of all pleadings and other filings in this proceeding.

WHEREFORE, the Clean Energy Buyers Association respectfully requests that the Commission enter an order allowing it to intervene in this proceeding, including the right to discovery and to otherwise exercise all statutory rights provided to intervenors under North Carolina law.

/s/ Joseph W. Eason

Joseph W. Eason, Esq.
N.C. State Bar No. 7699
joe.eason@nelsonmullins.com
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Phone: (919) 329-3800
Fax: (919) 329-3799

Weston Adams, Esq.
N.C. State Bar No. 18659
weston.adams@nelsonmullins.com
1320 Main Street
Meridian 17th Floor
Columbia, SC 29201
Phone: (803) 799-2000
Fax: (803) 256-7500

Jamey H. Goldin, Esq.*
Nelson Mullins Riley & Scarborough LLP
Liberty Center, Suite 600
151 Meeting Street
Charleston, SC 29401
jamey.goldin@nelsonmullins.com
Phone: (843) 534-4116
Fax: (843) 722-8700

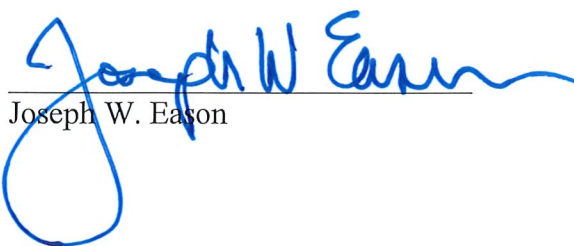
*Of Counsel

Counsel for Clean Energy Buyers Association

VERIFICATION

Joseph W. Eason, first being duly sworn, deposes and says that he is the attorney for the Clean Energy Buyers Association, formerly the Renewable Energy Buyers' Alliance; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of the Clean Energy Buyers Association.

This 8th day of March, 2023.



Joseph W. Eason

NORTH CAROLINA

WAKE COUNTY

Sworn to and subscribed before me

this 8 day of March, 2023.


Notary Public

My commission expires 7-24-2023



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition to Intervene of Clean Energy Buyers Association filed in Docket Nos. E-7 Sub 1289 and E-2 Sub 1314 was served electronically or via U.S. mail, first-class postage prepaid, upon all parties of record.

This the 8th day of March, 2023.

/s/ Joseph W. Eason
Joseph W. Eason

*Counsel for Clean Energy Buyers
Association*