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Mar 01 2022

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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	PETITION TO INTERVENE BY SOUTHERN ALLIANCE FOR CLEAN ENERGY, SIERRA CLUB, AND NATURAL RESOURCES DEFENSE COUNCIL

PURSUANT TO North Carolina Utilities Commission ("Commission") Rule R1-19, Southern Alliance for Clean Energy, the Sierra Club, and the Natural Resources Defense Council (collectively, "Petitioners") file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. Southern Alliance for Clean Energy ("SACE") is a regional nonprofit organization whose mission is to promote responsible energy choices to address the impacts of global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electricity service from utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast's energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region, and actively participates in utility-sponsored energy efficiency and demand-side management stakeholder collaborative meetings. SACE also promotes clean energy solutions such as energy efficiency, solar energy and wind energy through education and outreach in order to improve public health, the environment and the economy. SACE has its principal office in Tennessee, with a mailing address of Post

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Office Box 1842, Knoxville, TN 37901, and also has offices in North Carolina, South Carolina, Florida and Georgia.

2. The Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club works to accelerate the transition from dirty fuels like coal and gas to clean energy solutions like solar, wind and energy efficiency, and advocates for state and federal policies and industry action to achieve this transition. The Sierra Club has a long history of working to reduce air pollution from coal-fired power plants and to promote clean energy sources in North Carolina, and its members include customers of our state's regulated electric utilities. The address of the Sierra Club's principal office in North Carolina is 19 West Hargett Street, Suite 210, Raleigh, NC 27601.

3. The Natural Resources Defense Council ("NRDC") is a national environmental organization with over 30 years' experience working on state energy policy, including utility regulation and energy efficiency. NRDC, and its members in North Carolina who receive electricity service from electric utilities regulated by the Commission, have a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies. NRDC works to promote renewable energy and to advocate for the passage and implementation of clean energy standards and other policies that expand the market for wind and solar power. NRDC also works to promote energy efficiency and conducts research, partners with

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manufacturers, and advocates for policies that create dramatic energy savings. Likewise, NRDC encourages states to fully account for efficiency potential when they forecast whether they need new power plants or transmission lines in order to avoid costly infrastructure and lower customers' bills. NRDC has headquarters at 40 West 20th Street, New York, New York 10011 and also has an office in Asheville, North Carolina.

4. Petitioners and their members have a direct and substantial interest in the operations of North Carolina electric utilities. Petitioners and their members are interested in promoting greater reliance on energy efficiency and renewable energy and reducing carbon dioxide emissions by electric utilities in North Carolina. Moreover, Petitioners' members who receive electricity service at their homes and businesses from the utilities operating in our state will be affected by decisions made by the utilities in their planning processes—and by the Commission in this and future related proceedings, such as new plant certifications and rate cases.

5. Petitioners seek to intervene in this proceeding in order to participate in this important proceeding concerning the provision of electricity in our state. If allowed to intervene, Petitioners will advocate for a Carbon Plan that will achieve the statutory carbon-reduction goals through a low-cost, low-risk, reliable portfolio that emphasizes clean energy resources.

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

Gudrun Thompson
David L. Neal
Nicholas Jimenez
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

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Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to gthompson@selcnc.org, dneal@selcnc.org, and njimenez@selcnc.org.

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 1st day of March, 2022.

s/Gudrun Thompson
Gudrun Thompson
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Attorneys for Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council

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VERIFICATION

I, Gudrun Thompson, verify that the contents of the foregoing Petition to Intervene 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 Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council.

Date: March 1, 2022

Orange County, North Carolina

Sworn to and subscribed before me this day by Gundrun Thompson

This 1st day of March, 2022.

JANICE S GARRARD NOTARY PUBLIC WAKE COUNTY, NC

Janice S Garrard
Signature

Janice S Garrard, Notary Public

My commission expires: November 7, 2022

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene by Southern Alliance for Clean Energy, Sierra Club, and Natural Resources Defense Council as filed today in Docket No. E-100, Sub 179 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 1st day of March, 2022.

s/ Gudrun Thompson