

**BEFORE THE  
NORTH CAROLINA UTILITIES COMMISSION**

**DOCKET NO. E-100, SUB 165**

In the Matter of	)	
2020 Biennial Integrated Resource Plans and	)	<b>MOTION FOR SUBSTITUTION OF COUNSEL OF RECORD</b>
Related 2020 REPS Compliance Plans	)	

Pursuant to Commission Rules R1-7, R1-22, and R1-23—and consistent with Rule 1.16 of the North Carolina Rules of Professional Conduct, Vote Solar respectfully requests the Commission issue an order allowing attorney Thadeus B. Culley to withdraw as counsel of record for Vote Solar on or before February 26, 2021 and for attorney James Calvin (“Cal”) Cunningham III to be substituted as counsel of record for Vote Solar in the above-captioned docket. On March 1, 2021, Mr. Culley will begin new employment and will no longer be employed by Vote Solar.

Counsel represents that this motion was consented to and directed by Vote Solar. Undersigned counsel believe that substitution of counsel will not have an adverse effect on the interests of Vote Solar and that there is good cause for allowing Mr. Culley to withdraw. Mr. Cunningham is duly licensed to practice law by the State Bar of North Carolina and is an attorney in good standing.

Counsel further request that Mr. Culley be removed from the service list for the above-captioned docket and that all filings and communications be directed to the following:

Cal Cunningham  
2128 Clark Avenue, #557  
Raleigh, North Carolina 27605  
Email: [Cal@CalCunninghamNC.com](mailto:Cal@CalCunninghamNC.com)

WHEREFORE, undersigned counsel respectfully request that the Commission issue an order prior to February 26, 2021 that Attorney Thadeus B. Culley be allowed to withdraw as counsel for Vote Solar and that James Calvin (“Cal”) Cunningham III be substituted as counsel for Vote Solar in the above-captioned docket.

Respectfully submitted, on this the 5<sup>th</sup> of February, 2021.

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/s/

Thadeus B. Culley  
N.C. State Bar No. 47001  
Sr. Regional Director and  
Regulatory Counsel, Southeast  
Vote Solar  
1911 Ephesus Church Road  
Chapel Hill, NC 27517  
Telephone: (504) 616-0181  
Email: [thad@votesolar.org](mailto:thad@votesolar.org)

Counsel for Vote Solar

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/s/

James Calvin (“Cal”) Cunningham III  
N.C. State Bar No. 27216  
2128 Clark Avenue, #557  
Raleigh, North Carolina 27605  
Telephone: (336) 287-7466  
Email: [Cal@CalCunninghamNC.com](mailto:Cal@CalCunninghamNC.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. E-100, Sub 165, a copy of the Motion for Substitution of Counsel of Record via U.S. Mail or email transmission, where parties have consented to electronic service, on this day, February 5, 2021.

\_\_\_\_\_/s/\_\_\_\_\_  
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Thadeus B. Culley  
N.C. State Bar No. 47001  
Sr. Regional Director and  
Regulatory Counsel, Southeast  
Vote Solar  
1911 Ephesus Church Road  
Chapel Hill, NC 27517  
Telephone: (504) 616-0181  
Email: [thad@votesolar.org](mailto:thad@votesolar.org)