

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1314
DOCKET NO. E-7, SUB 1289

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition of Duke Energy Progress, LLC,
and Duke Energy Carolinas, LLC,
Requesting Approval of Green Source
Advantage Choice Program and
Rider GSAC

PETITION TO INTERVENE OF
CIGFUR II AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together with CIGFUR II, CIGFUR), pursuant to Commission Rules R1-5 and R1-19, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

1. CIGFUR II is an association of non-residential retail customers of Duke Energy Progress, LLC (DEP).
2. CIGFUR III is an association of non-residential retail customers of Duke Energy Carolinas, LLC (DEC) (together with DEP, Duke Energy).
3. Several of CIGFUR's member companies have publicly stated environmental, social, and governance (ESG) goals related to clean energy and/or are otherwise interested in potentially participating in voluntary customer renewables programs offered by Duke Energy. As prospective participants in such programs, CIGFUR's member companies direct, substantial, and pecuniary interests in this proceeding.

4. In addition, CIGFUR is committed to ensuring the directives contained in House Bill 951 pertaining to cost containment and the prohibition against interclass cross-subsidies are followed. To that end, as ratepayers and purchasers of electric power from Duke Energy, CIGFUR's member companies have direct, substantial, and pecuniary interests in this proceeding.
5. CIGFUR has been actively involved in Duke Energy's customer renewables programs stakeholder discussions. CIGFUR was also actively involved in both the legislative stakeholder process culminating in the passage of House Bill 951 (S.L. 2021-165), as well as the regulatory stakeholder process related to the initial Carbon Plan preceding Duke Energy's filing of its initial proposed Carbon Plan in May 2022. Both CIGFUR II and III were parties of record in Docket No. E-100, Sub 179.
6. 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.
7. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding.
8. CIGFUR's attorney, to whom all communications and pleadings should be addressed, is shown below:

Christina D. Cress
Bailey & Dixon, LLP
434 Fayetteville Street, Suite 2500
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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 8th day of February, 2023.

BAILEY & DIXON, LLP

/s/ Christina D. Cress

Christina D. Cress

N.C. State Bar No. 45963

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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.

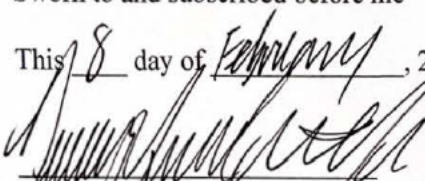
This the 8th day of February, 2023.


Christina D. Cress

STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 8 day of February, 2023, by Christina D. Cress.


Notary Public

Dale Turrentine, Jr.
Typed or Printed Notary Public Name

My Commission Expires: 01-30-2028



CERTIFICATE OF SERVICE

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

This the 8th day of February, 2023.

/s/ Christina D. Cress
Christina D. Cress

OFFICIAL COPY

Feb 08 2023