

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1300

In the Matter of

Application of Duke Energy  
Progress, LLC, for Adjustment of  
Rates and Charges Applicable to  
Electric Service in North Carolina  
and for Performance Based  
Regulation.

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PETITION OF CAROLINAS CLEAN  
ENERGY BUSINESS ASSOCIATION  
TO INTERVENE

## CCEBA'S PETITION TO INTERVENE

NOW COMES the Carolinas Clean Energy Business Association ("CCEBA"), pursuant to Rules R1-5, R1-7, and R1-19, and petitions to intervene in the above-captioned docket. In support of its Petition, CCEBA shows the Commission the following:

1. CCEBA is a non-profit organization formed under the laws of North Carolina. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of renewable power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas.

2. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its current name, and under its prior name: North Carolina Clean Energy Business Alliance.

3. Upon information and belief, this proceeding will, among other issues, address potential shared allocation of certain transmission costs as between the customers of DEP and DEC (together with DEP, the “Companies”) to address concerns raised during the Carbon Plan proceeding regarding the rate disparity between customers of DEP and DEC. See, e.g., Tr. Vol. 23, pp. 136-46, Docket No. E-100, Sub 179 (testimony of Public Staff witness James McLawhorn in response to questions from Chair Charlotte A. Mitchell and Commissioner Kimberly W. Duffley). CCEBA was an active Intervenor in the Carbon Plan proceeding and has been a lead participant in stakeholder and other meetings related to transmission planning in the DEP and DEC areas before the North Carolina Transmission Planning Cooperative. CCEBA’s members and their employees have significant experience and expertise in transmission planning and interconnection of renewable resources which will be helpful to the Commission in its consideration of these transmission-related issues.

11. Moreover, to the extent this rate case will include a request to recover certain investments to begin implementing the Carbon Plan, as an active Carbon Plan docket participant, CCEBA has information and expertise relevant to the concerns of the renewable energy industry and its customers which should be considered in those implementation discussions.

4. CCEBA’s address is 811 Ninth Street, Suite 120-158, Durham, NC 27705.

All correspondence related to this proceeding should be addressed to counsel:

John D. Burns  
General Counsel  
811 Ninth Street, Suite 120-158  
Durham, NC 27705  
(919) 306-6906  
[counsel@carolinasceba.com](mailto:counsel@carolinasceba.com)

5. Pursuant to Commission Rule R1-39, CCEBA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons stated, CCEBA respectfully requests that it be allowed to intervene in this matter.

Respectfully submitted this 14<sup>th</sup> day of March 2023.

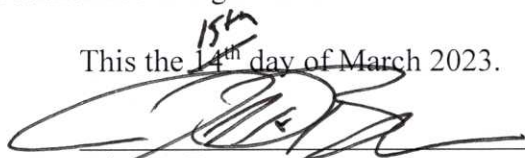
CAROLINAS CLEAN ENERGY BUSINESS  
ASSOCIATION

By: /s/ John D. Burns  
John D. Burns  
General Counsel  
NC Bar No. 24152  
811 Ninth Street  
Suite 120-158  
Durham, NC 27705  
(919) 306-6906  
[counsel@carolinasceba.com](mailto:counsel@carolinasceba.com)

**VERIFICATION**

John D. Burns, being first duly sworn, deposes and says that he is an attorney for CCEBA; that he has read the foregoing Petition to Intervene and that the facts stated therein are true of his personal knowledge, except as to any matters and things sated therein on information and belief, and as to those, he believes them to be true; and that he is authorized to sign his verification on behalf of CCEBA.


This the <sup>15<sup>th</sup></sup> day of March 2023.

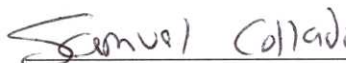
  
John D. Burns

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,  
this the 8<sup>th</sup> day of February, 2023.

[NOTARIAL SEAL]

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
Printed Name of Notary Public  
My Commission Expires: Sep. 19, 2024



**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail, deposited in the U.S. Mail, postage pre-paid, or by email transmission with the party's consent.

This the 14<sup>th</sup> day of March 2023.

/s/ John D. Burns  
John D. Burns  
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