

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 179

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Duke Energy Progress, LLC, and Duke)	PETITION TO INTERVENE
Energy Progress, LLC, 2022 Biennial)	OF CLEAN ENERGY
Integrated Resource Plans and Carbon Plan)	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 shows unto the Commission:

1. Clean Energy Buyers Association is a business association representing a diverse membership that directly do business within the State of North Carolina. ¹ The Clean Energy Buyers Association 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 310 members during the 1st Quarter of 2022, including some of the largest buyers of renewable energy that do business within North Carolina, the Clean Energy Buyers Association monitors and participates in policy-making proceedings and activities in this

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

State and other states, as well as before Congress and various federal agencies of the United States.

2. The members of Clean Energy Buyers Association conduct business operations within North Carolina and those operations, as well as the corporate policies of such members 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, the 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. The Clean Energy Buyers Association has not appeared previously as an intervenor in proceedings pending before this Commission, under either its current or former name. The 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 a carbon plan, 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 the Clean Energy Buyers Association.

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

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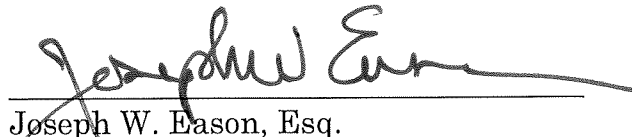
And to:

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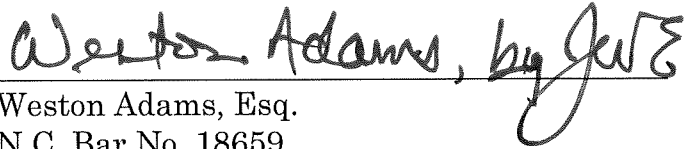
5. Pursuant to Commission Rule R1-39, the Clean Energy Buyers Association agrees through its undersigned counsel to electronic service of all pleadings and other filings in this proceeding.

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

Respectfully submitted, this 28th day of April, 2022.



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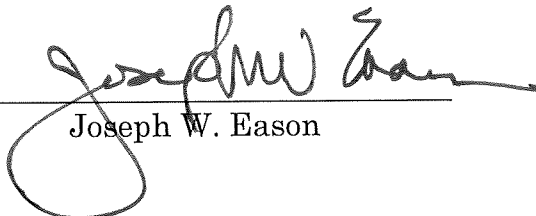


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VERIFICATION

Joseph W. Eason, first being duly sworn, deposes and says that he is the attorney for the Clean Energy Business 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 28th day of April, 2022.




Joseph W. Eason

North Carolina

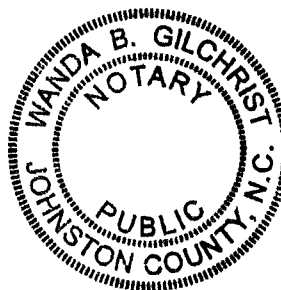
Wake County

Sworn to and subscribed before me

this 29 day of April, 2022.



Notary Public

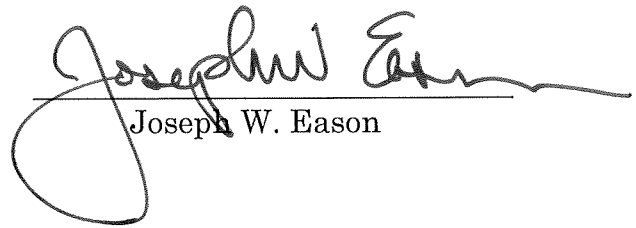


My commission expires:
7-24-2023

CERTIFICATE OF SERVICE

The undersigned attorney for the Clean Energy Business Association hereby certifies that he served the foregoing Petitiono Intervene upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

This 28th day of April, 2022.



Joseph W. Eason