

# SOUTHERN ENVIRONMENTAL LAW CENTER

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February 11, 2010

## VIA HAND DELIVERY

Ms. Renne Vance  
Chief Clerk  
North Carolina Utilities Commission  
430 North Salisbury Street  
Dobbs Building  
Raleigh, NC 27603-5918

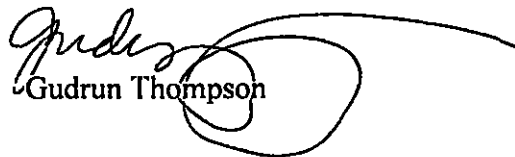
**FILED**  
**FEB 11 2010**  
Clerk's Office  
N.C. Utilities Commission

RE: Investigation of Integrated Resource Planning in North Carolina - 2009  
Docket No. E-100, Sub 124

Dear Ms. Vance:

Enclosed please find for filing in the above-captioned matter an original and thirty (30) copies of the Petition to Intervene of the Environmental Defense Fund, Southern Alliance for Clean Energy and the Sierra Club. By copy of this letter, I am serving all parties of record.

Sincerely,

  
Gudrun Thompson

Enclosures

cc: Parties of Record

*Full dist*

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 124

**FILED**

FEB 11 2010

Clerk's Office  
N.C. Utilities Commission

In the Matter of: )  
 )  
Investigation of Integrated Resource )  
Planning in North Carolina – 2009 )  
 )

**PETITION TO INTERVENE**

PURSUANT TO NCUC Rule R1-19, Environmental Defense Fund, Southern Alliance for Clean Energy and the Sierra Club, through counsel, file this petition to intervene in this docket, and provide the following information in support of their petition:

1. Environmental Defense Fund ("EDF") is a national nonprofit organization dedicated to protecting and enhancing the quality of the natural and human environment. EDF's activities include advocacy for greater reliance by electric utilities on clean resources such as energy efficiency. The address of EDF's North Carolina office is: 4000 Westchase Boulevard, Suite 510, Raleigh, NC 27607.

2. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization that advocates for energy plans, policies and systems that best serve the environmental, public health and economic interest of the communities in the Southeast. The principal address of SACE is: P.O. Box 1842, Knoxville, TN 37901.

3. The Sierra Club is a national environmental organization with a long history of working to reduce power plant air pollution and to promote clean energy sources in the state through its North Carolina Chapter. The address of the Sierra Club's North Carolina Chapter office is: 112 S. Blount St., Raleigh, NC 27601.

4. EDF, SACE, the Sierra Club and their members have a direct and substantial interest in the electric utility Integrated Resource Planning process in North


Carolina. Many of EDF, SACE, and the Sierra Club's members are customers of the electric utilities in North Carolina who use electric power in their homes and businesses. EDF, SACE, the Sierra Club and their members are interested in promoting greater reliance on cleaner energy sources by electric utilities in North Carolina.

5. EDF, SACE and the Sierra Club seek to intervene in this proceeding in order to advocate that the Commission undertake a comprehensive review of the electric utilities' resource planning documents to ensure that they comply with applicable requirements.

6. The attorney for EDF, SACE, and the Sierra Club to whom all correspondence and filings in this docket should be addressed is: Gudrun Thompson, Southern Environmental Law Center, 200 W. Franklin Street, Suite 330, Chapel Hill, NC 27516. Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to [gthompson@selcnc.org](mailto:gthompson@selcnc.org).

WHEREFORE, EDF, SACE, and the Sierra Club pray that they be allowed to intervene in this matter.

Respectfully submitted this 11<sup>th</sup> day of February, 2010.

  
Gudrun Thompson, NC Bar No. 28829  
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200 W. Franklin Street, Suite 330  
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*Attorney for Environmental Defense Fund, Southern  
Alliance for Clean Energy, and the Sierra Club*

## CERTIFICATE OF SERVICE

I hereby certify that the following persons on the docket mailing list have been served with the Petition to Intervene-of Environmental Defense Fund, Southern Alliance for Clean Energy, and the Sierra Club either by electronic mail or by deposit in the U.S. Mail, postage prepaid:

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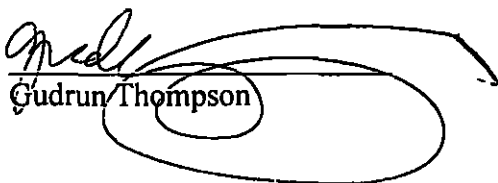
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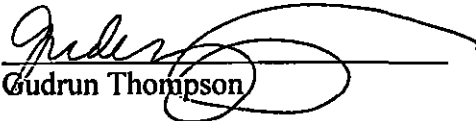
M. Gray Styers, Jr., Esq.  
Blanchard, Miller, Lewis & Styers, PA  
1117 Hillsborough Street  
Raleigh, NC 27603

This 11<sup>th</sup> day of February, 2010.

  
Gudrun Thompson

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 Environmental Defense Fund, Southern Alliance for Clean Energy and the Sierra Club..

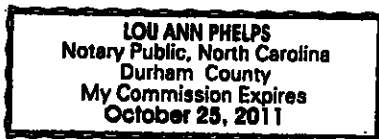
  
Gudrun Thompson

Date: February 11, 2010

Orange County, North Carolina

Sworn to and subscribed before me this day by Gudrun Thompson.

Date: February 11, 2010



  
Signature

Lou Ann Phelps, Notary Public

My commission expires: October 25, 2011