

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. M-100, SUB 164

In the Matter of
Consideration of the Federal Funding)
Available Under the Infrastructure) CUCA’S PETITION TO INTERVENE
Investment and Jobs Act)

Pursuant to North Carolina Utilities Commission (“Commission”) R1-19, Carolina Utility Customers Association, Inc. (“Petitioner” or “CUCA”), by and through its undersigned counsel, hereby respectfully petitions to intervene in the above-captioned docket. In support of the petition, Petitioner provides the following information:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at 8386 Six Forks Road, Suite 103, Raleigh, NC 27615.

2. The name and addresses of its principal officers are

Chair: David J. Lyons
Gerda Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Executive Director: Kevin N. Martin
Carolina Utility Customers Association, Inc.
8386 Six Forks Rd, Suite 103
Raleigh, NC 27615
kmartin@cucainc.org

3. CUCA’s attorneys, to whom all communications and pleadings should be addressed, are shown below. Copies of all communications and pleadings should also be served on CUCA’s Executive Director Kevin Martin:

Marcus W. Trathen
Craig D. Schauer
Brooks, Pierce, McLendon,
Humphrey & Leonard, LLP
Suite 1700, Wells Fargo Capitol Center
150 Fayetteville Street
P.O. Box 1800 (zip 27602)
Raleigh, NC 27601
mtrathen@brookspierce.com
cschauer@brookspierce.com

4. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina.

5. CUCA's member companies use electricity sold by the Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP") and Dominion Energy North Carolina ("DENC") in the operation of their manufacturing plants. CUCA's member companies also use natural gas sold by Public Service Company of North Carolina, Inc. ("PSNC") and Piedmont Natural Gas Company, Inc. ("PNG") in the operation of their manufacturing plants. The availability of an adequate supply of electricity and natural gas at a reasonable price is critical to the economic viability of CUCA's member companies.

6. The Infrastructure Investment and Jobs Act contains a number of provisions that provide federal funding for utility infrastructure. CUCA has an interest in DEC, DEP, DENC, PSNC, and PNG taking advantage of these available federal grants and loans to promote adequate, reliable, and economical utility service to CUCA's members.

7. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding,

including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenor under North Carolina law.

Respectfully submitted, this 10th day of February, 2022.

/s/ Craig D. Schauer

Marcus W. Trathen

Craig Schauer

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*Attorneys for Carolina Utility Customers
Association, Inc.*

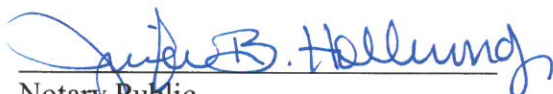
VERIFICATION

Kevin N. Martin, first being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc.; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, expect as to any matters and thing therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Carolina Utility Customers Association, Inc..

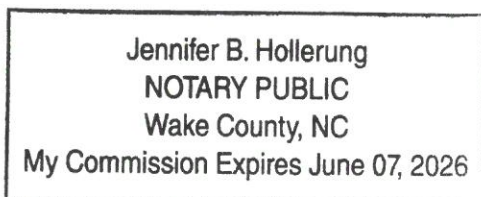
This the 9 day of February, 2022.



Sworn to and subscribed before me
this 9th day of Feb, 2022.


Notary Public

Commission Expires: June 7, 2026



Certificate of Service

I hereby certify that a copy of the foregoing *Petition to Intervene* has been served this day upon the parties of record in this proceeding by electronic mail.

This the 10th day of February, 2022.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

/s/ Craig D. Schauer