

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 179  
DOCKET NO. E-2, SUB 1297  
DOCKET NO. E-7, SUB 1268

DOCKET NO. E-100, SUB 179	)	
	)	
In the Matter of	)	
Duke Energy Progress, LLC, and	)	
Duke Energy Carolinas, LLC, 2022	)	
Biennial Integrated Resource Plans	)	
and Carbon Plan	)	
	)	CUCA’S PETITION TO INTERVENE
DOCKET NO. E-2, SUB 1297	)	
DOCKET NO. E-7, SUB 1268	)	
	)	
In the Matter of	)	
Duke Energy Progress, LLC, and Duke	)	
Energy Carolinas, LLC, 2022 Solar	)	
Procurement Pursuant to Session Law	)	
2021-165, Section 2(c)	)	

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 Docket Nos. E-2, SUB 1297 and E-7, SUB 1268. 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, including the territories in which Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, "Duke Energy") have been authorized by the Commission to sell electricity at retail.

5. CUCA's member companies use electricity sold by Duke Energy in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA's member companies. The availability of an adequate supply of electricity at a reasonable price will be impacted by the procurement of solar energy facilities. As a result, CUCA has a vital

interest in the matters at issue in the solar procurement proceedings and should be permitted to intervene and participate.

6. 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 Docket Nos. E-2, SUB 1297 and E-7, SUB 1268, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

Respectfully submitted, this 24th day of March, 2022.

/s/ Craig D. Schauer

Marcus W. Trathen

Craig Schauer

BROOKS, PIERCE, McLENDON,

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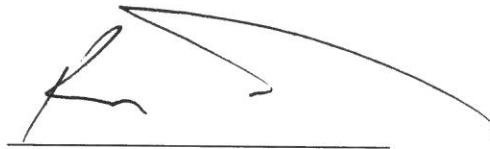
cshauer@brookspierce.com

*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..

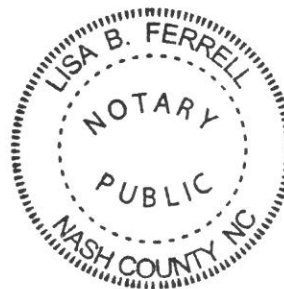
This the 24 day of March, 2022.



Sworn to and subscribed before me  
this 24<sup>th</sup> day of March, 2022.

Lisa B. Ferrell, Lisa B. Ferrell  
Notary Public

Commission Expires: 12-20-2022



**Certificate of Service**

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

This the 24th day of March, 2022.

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, LLP

/s/ Craig D. Schauer