

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 140

**In the Matter of Biennial  
Determination of Avoided Cost Rates  
for Electric Utility Purchases from  
Qualifying Facilities – 2014**

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**MOTION FOR WITHDRAWAL  
AND SUBSTITUTION OF  
COUNSEL FOR SACE**

Pursuant to R1-7, R1-22, and R1-23 of the Rules of the North Carolina Utilities Commission (“Commission”) and Rule 1.16 of the North Carolina State Bar Rules of Professional Conduct, Southern Alliance for Clean Energy (“SACE”), by and through its undersigned counsel, moves for the withdrawal and substitution of its counsel of record in the above-captioned docket.

SACE wishes to substitute Peter Stein, of the Southern Environmental Law Center, for Gudrun Thompson and Katie Ottenweller of the Southern Environmental Law Center, as counsel of record in this proceeding. Upon Commission approval of this motion, Ms. Thompson and Ms. Ottenweller will no longer represent SACE in this proceeding, and SACE requests that Ms. Thompson and Ms. Ottenweller be removed from the service list.

Mr. Stein is an attorney licensed in North Carolina and is a member in good standing of the North Carolina State Bar (Attorney No. 50305). SACE requests that all future filings and correspondence be directed to the attention of Mr. Stein as new counsel of record.

*New Counsel of Record:*

Peter D. Stein  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516  
Telephone: (919) 967-1450  
Fax: (919) 929-9421  
pstein@selcnc.org

Mr. Stein consents to electronic service of documents pursuant to NCUC Rule R1-39.

WHEREFORE, SACE respectfully moves the Commission for leave to substitute counsel and replace Gudrun Thompson and Katie Ottenweller with Peter Stein as counsel of record to SACE in this proceeding.

DATED this 23rd day of April, 2018.

Respectfully submitted,

s/ Gudrun Thompson  
Gudrun Thompson  
N.C. Bar No. 28829  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516  
Telephone: (919) 967-1450  
Fax: (919) 929-9421  
gthompson@selcnc.org

s/ Katie Ottenweller  
Katie Ottenweller  
Admitted *pro hac vice*  
Southern Environmental Law Center  
10 10th St NW, Suite 1050  
Atlanta, GA 30309  
Telephone: (404) 521-9900  
Fax: (404) 521-9909  
kottenweller@selcga.org

s/ Peter D. Stein  
Peter D. Stein  
N.C. Bar No. 50305  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516  
Telephone: (919) 967-1450  
Fax: (919) 929-9421  
pstein@selcnc.org

CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing *Motion for Withdrawal and Substitution of Counsel for SACE* either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 23rd day of April, 2018.

s/ Peter D. Stein  
Peter D. Stein