

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 194

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Biennial Determination of Avoided Cost
Rates for Electric Utility Purchases from
Qualifying Facilities – 2023

PETITION TO INTERVENE OF
CIGFUR I, II, AND III

NOW COME the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together with CIGFUR I and CIGFUR II, CIGFUR), pursuant to Commission Rules R1-5 and R1-19, and file this petition to intervene. In support of this petition, CIGFUR respectfully shows as follows:

1. CIGFUR I is an association of non-residential retail customers of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC).
2. CIGFUR II is an association of non-residential retail customers of Duke Energy Progress LLC (DEP).
3. CIGFUR III is an association of non-residential retail customers of Duke Energy Carolinas (DEC).
4. As ratepayers and purchasers of electric power from DENC, DEP, and DEC, respectively, CIGFUR's member companies have direct, substantial, and pecuniary interests in this proceeding.

5. CIGFUR's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR may be contacted by email through its counsel at cress@bdixon.com.
6. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding.
7. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress
Douglas E. Conant
Bailey & Dixon, LLP
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Raleigh, NC 27601
(919) 607-6055
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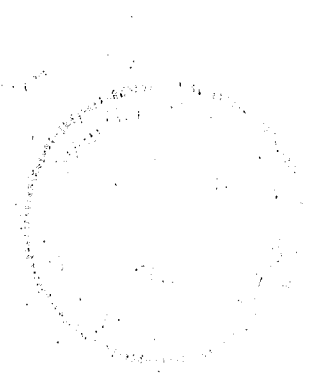
8. Pursuant to Commission Rule R1-39, CIGFUR agrees to accept electronic service of all pleadings and other papers filed in this docket.

WHEREFORE, CIGFUR respectfully requests that the Commission issue an order allowing it to intervene and participate in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted, this the 25th day of August, 2023.

BAILEY & DIXON, LLP

/s/ Douglas E. Conant
Christina D. Cress
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Attorneys for CIGFUR



VERIFICATION

Douglas E. Conant, first being duly sworn, deposes and says as follows: that he is one of the attorneys for CIGFUR; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters or things 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 CIGFUR.

This the 25th day of August, 2023.

D. Conant

Douglas E. Conant

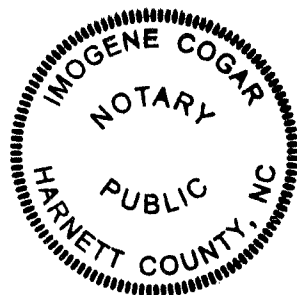
STATE OF NORTH CAROLINA
COUNTY OF WAKE

Sworn to and subscribed before me

This 25th day of August, 2023, by Douglas E. Conant.

Imogene Cogar
Notary Public

Imogene Cogar
Typed or Printed Notary Public Name



My Commission Expires: 10/1/2024

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that he caused the foregoing *Petition to Intervene of CIGFUR I, II, and III* to be served upon all parties of record to this proceeding, as set forth in the Service List maintained by the Chief Clerk of the NCUC, by electronic mail.

This the 25th day of August, 2023.

/s/ Douglas E. Conant
Douglas E. Conant

