

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-2, SUB 1283  
DOCKET NO. E-7, SUB 1259

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Joint Petition of Duke Energy Carolinas, LLC	)	
and Duke Energy Progress, LLC to Request the	)	PETITION TO INTERVENE OF
Commission to Hold a Joint Hearing with the	)	CIGFUR II AND III
Public Service Commission of South Carolina	)	
to Develop Carbon Plan	)	

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), pursuant to the Commission's November 23, 2021 Order Requesting Comments on Petition for Joint Proceeding, and file this petition to intervene in the above-referenced dockets. In support of this petition, CIGFUR shows as follows:

1. CIGFUR II is an association of large customers of Duke Energy Progress, LLC (DEP). CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR II may be contacted by email through its counsel at [ccress@bdixon.com](mailto:ccress@bdixon.com).
2. CIGFUR III is an association of large customers of Duke Energy Carolinas, LLC (DEC). CIGFUR III's mailing address is Post Office Box 1351, Raleigh, North Carolina 27602-1351. CIGFUR III may be contacted by email through its counsel at [ccress@bdixon.com](mailto:ccress@bdixon.com).
3. As ratepayers and purchasers of electric power from DEP, the member companies of CIGFUR II have direct, substantial, and pecuniary interests in this proceeding.
4. As ratepayers and purchasers of electric power from DEC, the member companies of CIGFUR III have direct, substantial, and pecuniary interests in this proceeding.

5. CIGFUR's participation in this docket will bring the important perspective of large, high load-factor industrial customers of DEP and DEC, respectively, with regard to the impact on generation planning and related issues resulting from the requirement of S.L. 2021-165 for the Commission to develop a Carbon Plan by December 31, 2022.

6. CIGFUR's attorneys, to whom all communications and pleadings should be addressed, are shown below:

Christina D. Cress  
Bailey & Dixon, LLP  
434 Fayetteville Street, Ste. 2500  
Raleigh, NC 27601  
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[ccress@bdixon.com](mailto:ccress@bdixon.com)

7. No other party is capable of adequately representing or protecting CIGFUR's interests in this proceeding. As such, CIGFUR has a vital interest in the matters at issue in this proceeding and should be permitted to intervene and participate as a party to this proceeding.

8. Pursuant to Commission Rule R1-39, CIGFUR agrees to electronic service of all pleadings and other papers in this docket.

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

Respectfully submitted this the 24th day of November, 2021.

**BAILEY & DIXON, LLP**

  
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*Attorneys for CIGFUR*

VERIFICATION

Christina D. Cress, first being duly sworn, deposes and says: that she is the attorney for CIGFUR; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR.

This 24th day of November, 2021.

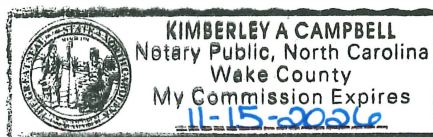
  
Christina D. Cress

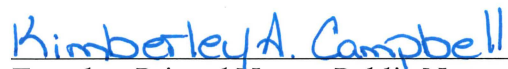
STATE OF NORTH CAROLINA  
COUNTY OF WAKE

Sworn to and subscribed before me

this 24<sup>th</sup> day of November, 2021, by Christina D. Cress..

  
Notary Public



  
Typed or Printed Notary Public Name

My Commission Expires: 11-15-2026

CERTIFICATE OF SERVICE

The undersigned attorney for CIGFUR hereby certifies that she served the foregoing Petition to Intervene upon the parties to this proceeding, as listed on the service list available on the NCUC's online docket system, by electronic mail.

This the 24th day of November, 2021.

  
Christina D. Cress