

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application of Duke Energy Carolinas,)	MOTION FOR LIMITED
LLC and Duke Energy Progress, LLC)	ADMISSION TO PRACTICE
for Approval of Proposed Electric)	PURSUANT TO
Transportation Pilot)	N.C. GEN. STAT. § 84-4.1
)	

Pursuant to North Carolina General Statutes (N.C.G.S.) Sections 62-60 and 84-4.1, and Rule R1-22 of the North Carolina Utility Commission's Rules of Practice and Procedure, Christina Andreen, Attorney with the law firm Southern Environmental Law Center, respectfully requests that the North Carolina Utilities Commission (the "Commission") enter an order admitting her to practice before the Commission for the purpose of appearing on behalf of the North Carolina Justice Center ("NC Justice Center") and the Southern Alliance for Clean Energy ("SACE") in the above-captioned proceeding. In support of her Motion, Ms. Andreen alleges and shows the Commission that:

1. The above-captioned matter is a regulatory proceeding before the Commission, governed by North Carolina public utility law.
2. The NC Justice Center is a nonprofit research and advocacy organization whose mission is to eliminate poverty in North Carolina by ensuring that every household in the state has access to the resources, services, and fair treatment it needs to achieve economic security. The NC Justice Center has its office at 224 S. Dawson Street, Raleigh, North Carolina 27601.

3. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe, and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia and Florida.

4. Ms. Andreen is an attorney in good standing, licensed to practice law in the State of Alabama, and she will appear on behalf of the NC Justice Center and SACE in the above-captioned proceeding.

5. Ms. Andreen's full name, address and bar identification number are:

Christina Andreen
Southern Environmental Law Center
2829 2nd Avenue S, Suite 282
Birmingham, Alabama 35233
Telephone: (205) 745-3060
Fax: (205) 745-3064
candreen@selcal.org
ASB-9696-D10R

6. Ms. Andreen will continue to represent NC Justice Center and SACE in the above-captioned proceeding until the final determination thereof, unless permitted to withdraw sooner by order of the Commission.

7. Ms. Andreen acknowledges that she will be subject to orders, disciplinary action, and civil jurisdiction of the Commission, General Court of Justice and the North Carolina State Bar in all respects as if she were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

8. The Bar of Alabama, in which Ms. Andreen is regularly admitted to practice, grants permission to members of the Bar of North Carolina in good standing to practice *pro hac vice* under circumstances similar to those authorized by N.C. Gen. Stat. § 84-4.1.

9. Ms. Andreen is associated for the purposes of appearing before the Commission with Nick Jimenez, an attorney with the Southern Environmental Law Center and a resident of North Carolina who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the legal proceedings, or any disciplinary matter, with the same effect as if personally made on Christina Andreen.

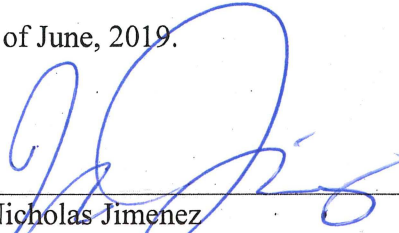
10. Ms. Andreen has not been disciplined by any court or lawyer regulatory organization, nor has she had *pro hac vice* privileges revoked.

11. The Statements required by N.C. Gen. Stat. § 84-4.1 are attached to this motion.

12. Upon issuance of an order granting this motion, the appropriate filings and fees will be made to the North Carolina State Bar and Administrative Office of the Courts as required by N.C. Gen. Stat. §84-4.1. At that time, Ms. Andreen will also file with the Commission a copy of the checks paid as filing fees.

WHEREFORE, the NC Justice Center and SACE request that this Motion be granted and that Christina Andreen be allowed to appear before the Commission in this matter.

Respectfully submitted this the 5th day of June, 2019.



Nicholas Jimenez
NC Bar No. 53708
njimenez@selcnc.org
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421



Christina Andreen
AL Bar No. ASB-9696-D10R
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*Attorneys for North Carolina Justice Center and
Southern Alliance for Clean Energy*

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application of Duke Energy Carolinas,)	Statement Required by
LLC and Duke Energy Progress, LLC)	N.C. Gen. Stat. § 84-4.1
for Approval of Proposed Electric)	
Transportation Pilot)	
)	

I, Christina M. Andreen, hereby state that:

1. I am an attorney at law regularly admitted to practice and in good standing in the State of Alabama.

2. I am counsel for the North Carolina Justice Center ("NC Justice Center") and Southern Alliance for Clean Energy ("SACE") and desire to represent NC Justice Center and SACE in the above-captioned proceeding, which is currently pending before the North Carolina Utilities Commission (the "Commission").

3. My full name, address and bar identification number are:

Christina Andreen
Southern Environmental Law Center
2829 2nd Avenue S, Suite 282
Birmingham, Alabama 35233
Telephone: (205) 745-3060
Fax: (205) 745-3064
candreen@selcal.org
ASB-9696-D10R

4. Unless permitted to withdraw sooner by the Commission, I will continue to represent NC Justice Center and SACE in the above-captioned proceeding until the final determination thereof.

5. I agree, with reference to all matters incident to Commission proceedings, to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the Commission, the General Court of Justice, and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

6. The State of Alabama, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar of North Carolina.

7. I have associated, for purposes of appearing and practicing in Commission proceedings, with Nick Jimenez, 601 West Rosemary Street, Suite 220 Chapel Hill, North Carolina 27516, an attorney who is a resident of the State of North Carolina and who is duly and legally permitted to practice in the General Court of Justice in North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding or any disciplinary matter, with the same effect as if personally made on me within this State.

8. I have not been disciplined by any court or lawyer regulatory organization and have not had a revocation of any *pro hac vice* admission.



Christina M. Andreen
ASB-9696-D10R

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197


DOCKET NO. E-7, SUB 1195

In the Matter of:)
Application of Duke Energy Carolinas, LLC)
and Duke Energy Progress, LLC for)
Approval of Proposed Electric)
Transportation Pilot)
)

**Statement Required by
N.C. Gen. Stat. § 84-4.1(2)**

I, Al Ripley, hereby certify that I am the Director of Consumer and Housing Projects for North Carolina Justice Center, 224 S. Dawson Street, Raleigh, North Carolina 27601, and that North Carolina Justice Center has requested that Christina Andreen represent it in the above-captioned proceeding before the North Carolina Utilities Commission.

This the 4th day of June, 2019.


Al Ripley
Director, Consumer and Housing Project
North Carolina Justice Center
224 S. Dawson Street
Raleigh, North Carolina 27601
al@ncjustice.org
(919) 856-2570

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197

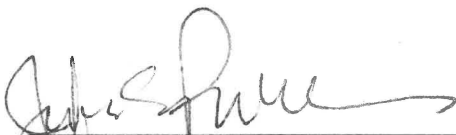
DOCKET NO. E-7, SUB 1195

In the Matter of:)
Application of Duke Energy Carolinas, LLC)
and Duke Energy Progress, LLC for)
Approval of Proposed Electric)
Transportation Pilot)
)

Statement Required by
N.C. Gen. Stat. § 84-4.1(2)

I, Jennifer Rennicks, hereby certify that I am the Director of Policy and Communications for Southern Alliance for Clean Energy, P.O. Box 1842, Knoxville, TN 37901 and that Southern Alliance for Clean Energy has requested that Christina Andreen represent it in the above-captioned proceeding before the North Carolina Utilities Commission.

This the 30th day of May, 2019.



Jennifer Rennicks
Director, Policy and Communications
Southern Alliance for Clean Energy
P.O. Box 1842, Knoxville, TN 37901
jennifer@cleanenergy.org
(865) 637-6055

VERIFICATION

I, Christina Andreen, verify that the contents of the foregoing Motion For Limited Admission to Practice Pursuant to N.C. Gen. Stat. § 84-4.1 are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of North Carolina Justice Center and Southern Alliance for Clean Energy.




Christina Andreen

Date: 06-05-2019

Jefferson County, Alabama

Sworn to and subscribed before me this day by Christina M. Andreen.

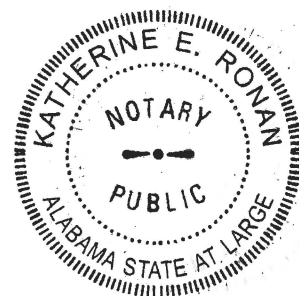
This the 5th day of June, 2019



Signature

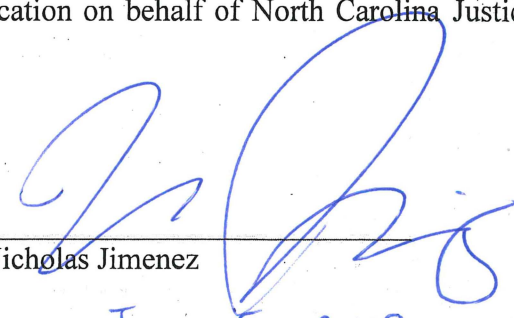
Katherine Ronan, Notary Public

My commission expires: _____ MY COMMISSION EXPIRES AUGUST 17, 2021

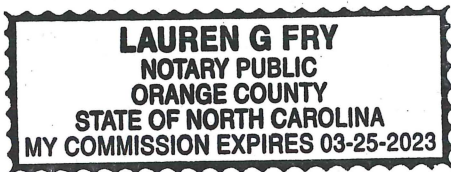


VERIFICATION

I, Nicholas Jimenez, verify that the contents of the foregoing Motion For Limited Admission to Practice Pursuant to N.C. Gen. Stat. § 84-4.1 are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of North Carolina Justice Center and Southern Alliance for Clean Energy.



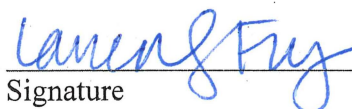
Nicholas Jimenez
Date: June 5, 2019



Orange County, North Carolina

Sworn to and subscribed before me this day by Nicholas Jimenez.

This the 5 day of June, 2019



Signature

Lauren G Fry, Notary Public

My commission expires: 3/25/2023

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application of Duke Energy Carolinas,)	ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE
LLC and Duke Energy Progress, LLC)	
for Approval of Proposed Electric)	
Transportation Pilot)	
)	

BY THE CHAIRMAN: On June 5, 2019, Christina M. Andreen, an attorney admitted to practice in the State of Alabama, filed a motion with the Commission seeking authority to appear *pro hac vice* on behalf of the North Carolina Justice Center and Southern Alliance for Clean Energy in the above-captioned docket. Ms. Andreen is associated with Nick Jimenez, Counsel for the North Carolina Justice Center and Southern Alliance for Clean Energy, an attorney in good standing in the State of North Carolina, for the purpose of this limited representation.

The Chairman is of the opinion that good cause exists to grant the motion for admission *pro hac vice*.

IT IS, THEREFORE, ORDERED as follows:

1. That Ms. Andreen's motion for admission *pro hac vice* in this proceeding shall be, and is hereby, allowed; and

2. That Ms. Andreen's name and address is:

Christina Andreen
Southern Environmental Law Center
2829 2nd Avenue S, Suite 282
Birmingham, Alabama 35233
Telephone: (205) 745-3060
Fax: (205) 745-3064

candreen@selcal.org
ASB-9696-D10R

ISSUED BY ORDER OF THE COMMISSION.

This the ____ day of _____, 2019.

NORTH CAROLINA UTILITIES COMMISSION

CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Motion for Limited Admission to Practice Pursuant to N.C. Gen. Stat. § 84-4.1 either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 5th day of June, 2019.

s/ Nick Jimenez
Nick Jimenez