BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-7, SUB 1155

In the Matter of:) Application of Duke Energy Carolinas, LLC for) Approval of Residential New Construction Program)

PETITION TO INTERVENE OF PIEDMONT NATURAL GAS COMPANY, INC.

Piedmont Natural Gas Company, Inc. ("Piedmont"), through counsel and pursuant to Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), respectfully requests the Commission to enter an order permitting Piedmont to intervene and participate in the abovecaptioned proceeding. In support of its Petition to Intervene, Piedmont shows the Commission the following:

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1. Any notices or other communications with respect to this Petition should be sent to:

James H. Jeffries IV McGuireWoods LLP 201 North Tryon Street, Suite 3000 Charlotte, NC 28202 Telephone: 704-343-2348 Email: jjeffries@mcguirewoods.com

and

Brian S. Heslin Duke Energy Corporation 550 S. Tryon Street Charlotte, NC 28202 Telephone: 980-373-0550 Email: brian.heslin@duke-energy.com

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of North Carolina, South Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in North Carolina are subject to the jurisdiction of this Commission.

3. On September 21, 2020, Duke Energy Carolinas, LLC ("DEC"), in order to comply with the Commission's June 23, 2020 *Order Holding in Abeyance Decision on Motion to Withdraw Program and Requiring Filing of Proposed Modified Program* ("Abeyance Order"), filed its proposed Residential New Construction program ("RNC Program").

4. In its Abeyance Order, the Commission ordered that DEC and the Public Staff resume discussions with natural gas local distribution companies ("LDCs") to attempt to reach an agreement on modifications to DEC's RNC Program.

5. Piedmont has been actively involved in the discussions concerning the modification of DEC's RNC Program contemplated in this docket.

6. As a LDC operating within the jurisdiction of this Commission, Piedmont will be directly affected by the outcome of this proceeding. Therefore, Piedmont has a valid and substantial interest in this proceeding. This interest cannot be adequately represented by other parties to this proceeding.

WHEREFORE, based on the foregoing, Piedmont respectfully requests that the Commission issue an order allowing it to intervene and fully participate in the above captioned proceeding.

Respectfully submitted, this the 4th day of January, 2021.

Piedmont Natural Gas Company, Inc.

<u>/s/ James H. Jeffries IV</u> James H. Jeffries IV McGuireWoods LLP 201 North Tryon Street, Suite 3000 Charlotte, NC 28202 Telephone: 704-343-2348 Email: jjeffries@mcguirewoods.com

<u>/s/ Brian S. Heslin</u> Brian S. Heslin Deputy General Counsel Duke Energy Corporation 550 S. Tryon Street Charlotte, NC 28202 Telephone: 980-373-0550 Email: brian.heslin@duke-energy.com

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STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

VERIFICATION

Bruce Barkley, being duly sworn, deposes and says that he is Vice President – Rates and Natural Gas Supply of Piedmont Natural Gas Company, Inc., that as such, he has read the foregoing and knows the contents thereof; and he believes that the facts set forth therein are true and correct.

Bruce Barkley

Mecklenburg County, North Carolina Signed and sworn to before me this day by Bruce Barkley

Date: 12/19/2020

Notary Public

(Official Seal)

My commission expires: 09-15-2022



CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 4th day of January, 2021.

/s/ Richard K. Goley Richard K. Goley