

CRISP & PAGE, PLLC

An Energy, Utility and Cooperative Law Firm

4010 Barrett Dr., Suite 205
Raleigh, NC 27609-6622

Telephone (919) 791-0009
Fax (919) 791-0010
www.crisppage.com

October 26, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building, Fifth Floor
430 North Salisbury Street
Raleigh, North Carolina 27602

VIA E-FILE

Re: Docket No. E-100, Sub 165; 2020 Biennial Integrated Resource Plans
and Related 2020 REPS Compliance Plans

Dear Ms. Campbell:

We electronically submit for filing in the above-referenced matter, on behalf of Carolina Utility Customers Association, Inc. ("CUCA"), a Petition to Intervene.

Pursuant to the North Carolina Utilities Commission's (Commission) Order Suspending Requirement for filing Paper Copies, issued on March 30, 2020, we understand that the requirement to file additional paper copies of electronically filed documents with the Commission has been suspended until further notice by order of the Commission.

Please let me know, at your early convenience, if you have any questions concerning this filing.

Very truly yours,

CRISP & PAGE, PLLC

/s/ Robert F. Page

Robert F. Page

Enclosures

cc: Parties of Record

{00136792.DOCX}

ROBERT F. PAGE
rpage@crisppage.com

CYNTHIA M. CURRIN
(Of Counsel)
ccurrin@crisppage.com

WILLIAM T. CRISP II
(1924-1992)

OFFICIAL COPY

Oct 26 2020

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, Sub 165

In the Matter of)	
2020 Biennial Integrated Resource Plans)	
and Related 2020 REPS Compliance Plans)	Petition of Carolina Utility Customers
)	Association, Inc. to Intervene
)	
)	
)	
)	

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, files this Petition pursuant to G.S. 62-72 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") that CUCA be permitted to intervene and participate in the above-captioned proceeding. In support of this petition, CUCA states as follows:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at Suite 210, Trawick Professional Center, 1708 Trawick Road, Raleigh, North Carolina 27604. The names and addresses of its principal officers are:

Chair: David J. Lyons
Gerdau Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Vice Chair: Sean M. Finsel
Moen, Inc.
2609 Cox Mill Road
Sanford, NC 27332-9727

Executive Director: Kevin N. Martin
Carolina Utility Customers Association, Inc.
Suite 210, Trawick Professional Center
1708 Trawick Road
Raleigh, North Carolina 27604
Email: kmartin@cucainc.org

2. CUCA's attorney, to whom all communications and pleadings should be addressed, is shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Kevin Martin.

Robert F. Page
Crisp & Page, PLLC
4010 Barrett Drive, Suite 205
Raleigh, NC 27609
Telephone: (919) 791-0009
Facsimile: (919) 791-0010
Email: rpage@crisppage.com

3. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Duke") have been authorized by the Commission to sell electricity at retail.

4. CUCA's member companies use electricity sold by Duke in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA's member companies. Duke's filing will affect both the reliability and the rates associated with Duke's sale of electricity to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

5. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

This, the 26th day of October, 2020.

CRISP & PAGE, PLLC

/s/ Robert F. Page

By: _____

Robert F. Page
N.C. State Bar No. 3307
4010 Barrett Drive, Suite 205
Raleigh, NC 27609
(919) 791-0009 Telephone
(919) 791-0010 Fax
rpage@crisppage.com Email

CERTIFICATE OF SERVICE

I, the undersigned counsel for CUCA, do hereby certify that a copy of the foregoing Petition to Intervene was served upon all parties of record in this proceeding, or their legal counsel, by electronic mail.

This, the 26th day of October, 2020.

/s/ Robert F. Page

Robert F. Page

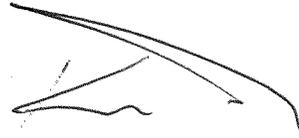
STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF WAKE

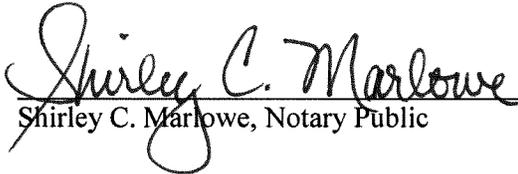
Kevin Martin, being duly sworn, deposes and says that he is the Executive Director of Carolina Utility Customers Association, Inc., the Intervenor herein; that he has read the foregoing Petition of Carolina Utility Customers Association, Inc., to Intervene, and knows the contents thereof, and that the same is true of his own knowledge, except as to those matters herein state upon information and belief, and as to those, he believes them to be true; and that this verified petition be used as an affidavit.

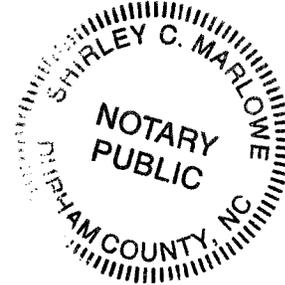
This the 26th day of October, 2020.



KEVIN MARTIN

SWORN to and subscribed before me,
This the 26th day of October, 2020.


Shirley C. Marlowe, Notary Public



My Commission Expires: May 10, 2024