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December 20, 2021

Ms. A. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

**RE: *In the matter of the Joint Petition of Duke Energy Carolinas, LLC and  
Duke Energy Progress, LLC, to Request the Commission to Hold a Joint  
Hearing with the Public Service Commission of South Carolina to  
Develop Carbon Plan  
NCUC Dockets E-2, Sub 1283 and E-7, Sub 1259  
CLEAN POWER SUPPLIERS ASSOCIATIONS'  
PETITION TO INTERVENE***

Dear Ms. Dunston:

On behalf of Clean Power Suppliers Association's, we hereby file Petition to Intervene in the above referenced matter and dockets.

Thank you for your assistance with this submittal. Should you have any questions concerning same, please do not hesitate to contact me.

Sincerely,

*/s/ Benjamin L. Snowden*

Benjamin L. Snowden

pbb

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota  
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

**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,	)	CLEAN POWER SUPPLIERS
LLC, and Duke Energy Progress, LLC,	)	ASSOCIATION'S
to Request the Commission to Hold a	)	PETITION TO INTERVENE
Joint Hearing with the Public Service	)	
Commission of South Carolina to	)	
Develop Carbon Plan	)	

NOW COMES Clean Power Suppliers Association ("CPSA"), a North Carolina nonprofit association, pursuant to the North Carolina Utilities Commission's ("Commission") November 23, 2021 Order Requesting Comments on Petition for Joint Proceeding, and files this Petition to Intervene in the above-referenced dockets pursuant to Commission Rules R1-5, R1-7, and R1-19. In support thereof, CPSA shows the following:

1. CPSA is a non-profit corporation formed under the laws of North Carolina, with business members doing business in the State. CPSA's members are primarily developers of independent solar generating facilities. CPSA's mission is to promote a sustainable future through the development of renewable energy resources in the Carolinas.
2. CPSA is actively involved in the implementation of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and goals of the law implemented in a manner consistent with legislative intent.
3. CPSA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. CPSA's principal office is located at 5310 South Alston Avenue, Building 300, Durham, NC 27713.

5. All communications and correspondence related to this proceeding should be addressed to Regulatory Counsel for CPSA as follows:

Benjamin L. Snowden  
Fox Rothschild LLP  
434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Telephone: 919-719-1257  
E-mail: [BSnowden@foxrothschild.com](mailto:BSnowden@foxrothschild.com)

6. Pursuant to Commission Rule R1-39, CPSA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, CPSA prays that it be allowed to intervene in this matter.

Respectfully submitted this the 20th day of December 2021.

**FOX ROTHSCHILD LLP**



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*Counsel for Clean Power Suppliers  
Association*

# VERIFICATION

Steven J. Levitas, being first duly sworn, deposes and says: that he is the Chairman of CPSA, that he has read the foregoing Petition to Intervene and knows the contents thereof to be true and correct of his own personal knowledge, except as to those matters therein stated upon information and belief, and as to those, he believes them to be true and correct. In his capacity as Chairman, he is authorized to sign this Verification on behalf of CPSA.

This the 20th day of December, 2021.

*Steven J. Levitas*

(Name)

NORTH CAROLINA  
WAKE COUNTY  
*Buncombe*

Sworn to and subscribed before me,  
this 20<sup>th</sup> day of December, 2021.

*[Signature]*

Notary Public

*Corinne Wullmann*  
Printed Name of Notary Public

My Commission Expires: April 11<sup>th</sup> 2024

(SEAL)



## CERTIFICATE OF SERVICE

I hereby certify that all persons on the Commission's docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U. S. mail, postage pre-paid, or by e-mail transmission with the party's consent.

This the 20th day of December 2021.

*/s/ Benjamin L. Snowden*

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Dec 20 2021