

SOUTHERN ENVIRONMENTAL LAW CENTER

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May 6, 2019

Via Electronic Filing

Ms. Martha Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

RE: In the Matter of: Application for Approval of Proposed Electric
Transportation Pilot
Docket Nos. E-2, Sub 1197 and E-7, Sub 1195

Dear Ms. Jarvis:

Enclosed for filing in the referenced docket is the *Petition to Intervene* on behalf of the North Carolina Justice Center and the Southern Alliance for Clean Energy.

By copy of this letter, I am serving all parties of record on the service list. Please let me know if you have any questions about this filing.

This the 6th day of May, 2019.

s/Nick Jimenez
Nicholas Jimenez
N.C. Bar No. 53708
Southern Environmental Law Center
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Chapel Hill, NC 27516
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NJ/lgf
cc: Parties of Record

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,)	PETITION TO INTERVENE OF
LLC and Duke Energy Progress, LLC)	NORTH CAROLINA JUSTICE
for Approval of Proposed Electric)	CENTER AND SOUTHERN
Transportation Pilot)	ALLIANCE FOR CLEAN ENERGY
)	

Pursuant to Commission Rule R1-19, the North Carolina Justice Center (“NC Justice Center”) and the Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), file this petition to intervene in the above-captioned dockets, and provide the following information in support of their petition:

1. On March 29, 2019, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies”) applied to the North Carolina Utilities Commission (“Commission”) for approval of a proposed electric transportation pilot (“ET Pilot”).

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. The NC Justice Center has previously intervened on behalf of low-income North Carolinians in proceedings before the Commission.

4. The NC Justice Center and the low-income consumers whose interests it represents have a direct and substantial interest in this proceeding. Many of these low-income consumers are customers of DEC and DEP and are therefore subject to the rate impacts of the ET Pilot, as well as eligible to realize its potential benefits. The NC Justice Center seeks to intervene in this proceeding to ensure that its interests in promoting equitable access to a cleaner, electrified transportation sector, reducing the pollution burden that is disproportionately borne by low-income communities and communities of color, and lifting the energy burden borne by North Carolina's lower-income households are represented.

5. The Southern Alliance for Clean Energy ("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.

6. SACE has participated actively in numerous dockets before the Commission, and SACE has participated in parallel ET pilot program proceedings currently pending before the South Carolina Public Service Commission, Docket Nos. 2018-321-E (DEC) and 2018-322-E (DEP).

7. SACE and its members have a direct and substantial interest in this proceeding. SACE has members who are customers of DEC and DEP and are therefore subject to the rate impacts of the ET Pilot, as well as eligible to realize its potential benefits. SACE seeks to intervene in this proceeding in order to ensure that its interests

and members' interests in promoting a cleaner, electrified transportation sector and increasing the proportion of electricity generation provided by renewable energy technologies are represented.

8. The attorney for the NC Justice Center and SACE to whom all correspondence and filings in this docket should be addressed is:

Nick Jimenez
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to Commission Rule R1-39 is preferred and should be addressed to njimenez@selcnc.org.

WHEREFORE, the NC Justice Center and SACE request that they be allowed to intervene in this docket.

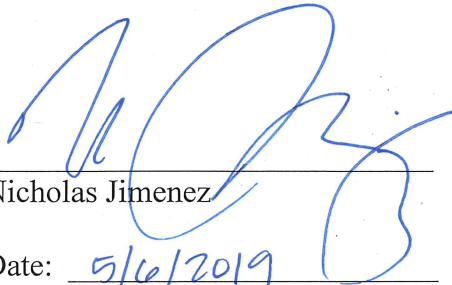
Respectfully submitted this the 6th day of May, 2019.

s/ Nick Jimenez
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*Attorney for North Carolina Justice Center and
Southern Alliance for Clean Energy*

VERIFICATION

I, Nicholas Jimenez, verify that the contents of the foregoing *Petition to Intervene* 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 the Southern Alliance for Clean Energy.



Nicholas Jimenez
Date: 5/6/2019

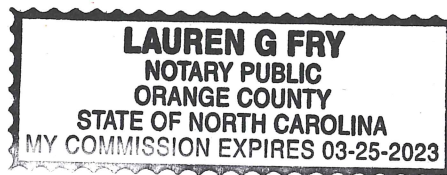
Orange County, North Carolina

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

This the 6th day of May, 2018.



Signature



Lauren Fry, Notary Public

My commission expires: 3/25/2023

CERTIFICATE OF SERVICE

I certify that the persons on the service list have been served with the foregoing *Petition to Intervene* on behalf of North Carolina Justice Center and the Southern Alliance for Clean Energy, either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 6th day of May, 2019.

s/ Nicholas Jimenez

Nicholas Jimenez