

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. E-2, SUB 1249  
DOCKET NO. E-7, SUB 1237  
DOCKET NO. E-22, SUB 585**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Petition for Expedited Approval of	)	
Temporary Adjustments to Electricity	)	<b>PETITION TO INTERVENE</b>
Billing Demand Charges	)	
	)	

**NOW COMES** the North Carolina Electric Membership Corporation ("NCEMC") and, pursuant to North Carolina Utilities Commission ("Commission") Rules R1-7 and R1-19 and the Commission's April 2, 2020 *Order Joining Necessary Parties and Requesting Comments*, petitions to intervene in the above-referenced docket.

**Petition to Intervene**

NCEMC requests that it be permitted to intervene and participate in the above-captioned proceeding and shows unto the Commission as follows:

1. NCEMC's attorneys, to whom all communications and pleadings should be addressed are:

Richard M. Feathers  
Senior Vice President and General Counsel  
North Carolina Electric Membership Corporation  
Post Office Box 27306  
Raleigh, NC 27611  
Telephone: (919) 875-3121  
Email: [rick.feathers@ncemcs.com](mailto:rick.feathers@ncemcs.com)

Michael D. Youth  
Government and Regulatory Affairs Counsel  
Telephone: (919) 622-8135  
Email: [michael.youth@ncemcs.com](mailto:michael.youth@ncemcs.com)

2. NCEMC is a generation and transmission cooperative responsible for the power supply of 25 member distribution cooperatives throughout the State of North Carolina. NCEMC purchases power pursuant to wholesale contracts with Duke Energy Progress, LLC and others to supply its members. These members, in turn, supply power to their members, the end-use retail consumers.
3. A number of NCEMC's member distribution cooperatives recover cost of service from business members via, *inter alia*, contract demand charges under various commercial and industrial rate schedules. In turn, NCEMC recovers cost of service from its members via, *inter alia*, contract demand charges. Finally, Duke Energy Progress, LLC and NCEMC's other wholesale suppliers recover cost of service from NCEMC via, *inter alia*, contract demand charges.
4. No other party can adequately represent NCEMC's interests in this proceeding.
5. NCEMC agrees to accept electronic service of all filings in the Docket.
6. NCEMC asks that the Commission make it a party to this proceeding and permit it to exercise all rights provided to intervenors under North Carolina law and this Commission's rules.

**WHEREFORE**, NCEMC requests that its *Petition to Intervene* be granted.

Respectfully submitted this the 9<sup>th</sup> day of April, 2020.

**NORTH CAROLINA ELECTRIC  
MEMBERSHIP CORPORATION**

By: /s/ Michael D. Youth  
Michael D. Youth  
Government and Regulatory Affairs Counsel  
Post Office Box 27306  
Raleigh, North Carolina 27611  
Telephone: (919) 875-3060  
Email: michael.youth@ncemcs.com

**STATE OF NORTH CAROLINA**

**COUNTY OF WAKE**

Michael D. Youth swears and says under penalty of perjury:

1. He is Government and Regulatory Affairs Counsel for North Carolina Electric Membership Corporation.
2. He has read the foregoing Petition to Intervene and knows its contents.
3. The matters stated in this instrument are true of his knowledge, except as to those matters that are stated to be on information and belief, and, as to those matters, he believes them to be true.
4. Due to the coronavirus pandemic and the need to maintain Social Distancing Requirements, as that term has been defined at Section 2.E. of Executive Order 121 dated March 27, 2020, a notary public could not reasonably be obtained prior to the date of actual filing.

/s/ Michael D. Youth  
Michael D. Youth

**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing document has been served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

This the 9<sup>th</sup> day of April, 2020.

/s/ Michael D. Youth  
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Government and Regulatory Affairs Counsel  
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