

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

Docket No. SP-100, Sub 31

In the Matter of)	
Petition by North Carolina Waste)	
Awareness and Reduction Network for)	ELECTRICITIES' PETITION
A Declaratory Ruling Regarding Solar)	TO INTERVENE
Facility Financing Arrangements and)	
Status as a Public Utility)	

PETITION TO INTERVENE

NOW COME ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1 (collectively hereinafter "Petitioners" or "the Power Agencies"), and petition the Commission, pursuant to Commission Rule R1-19, for leave to intervene in this proceeding.

In support of their Petition, Petitioners state the following:

1. The names and mailing address of the Petitioners are:

ElectriCities of North Carolina, Inc.
North Carolina Eastern Municipal Power Agency
North Carolina Municipal Power Agency Number 1
1427 Meadow Wood Blvd.
Raleigh, NC 27604

2. The name and address of Petitioners' attorney are:

Daniel C. Higgins
Burns, Day & Presnell, P.A.
P.O. Box 10867
Raleigh, NC 27605
dhiggins@bdppa.com

3. ElectriCities of North Carolina, Inc. ("ElectriCities") is a joint municipal assistance agency organized pursuant to N.C. Gen. Stat. § 159B-43 by North Carolina

Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number

1. ElectriCities is a membership organization that provides aid and assistance to its members in connection with the operation of their electric systems. ElectriCities also provides management services to its members.

4. North Carolina Eastern Municipal Power Agency (“NCEMPA”) is a joint agency organized pursuant to Chapter 159B by its members, which consist of 32 cities located in that portion of eastern North Carolina served by Duke Energy Progress, Inc. f/k/a Progress Energy Carolinas, Inc. (“DEP”), and Dominion North Carolina. NCEMPA is not an electric power supplier under N.C. Gen. Stat. § 62-133.8 but is acting in its capacity as REPS compliance aggregator for its 32 member municipalities, which are electric power suppliers.

5. North Carolina Municipal Power Agency Number 1 (“NCMPA1”) is a joint agency organized pursuant to Chapter 159B by its members, which consist of 19 cities located in that portion of western North Carolina served by Duke Energy Carolinas, LLC. NCMPA1 is not an electric power supplier under N.C. Gen. Stat. § 62-133.8 but is acting in its capacity as REPS compliance aggregator for its 19 member municipalities, which are electric power suppliers.

6. The Power Agencies request that any notices, filings or other communications with respect to this Petition be served on the following:

Daniel C. Higgins
Burns, Day & Presnell, P.A.
P.O. Box 10867
Raleigh, N.C. 27605
dhiggins@bdppa.com

and

David Barnes
Chief Legal and Ethics Officer
ElectriCities of North Carolina, Inc.
1427 Meadow Wood Blvd.
Raleigh, N.C. 27604
dbarnes@electricities.org

7. The Commission's disposition of issues raised in this docket will be of interest to the Power Agencies, as their member municipalities are electric power suppliers in North Carolina, supplying power to the citizens of their respective cities and towns. No other party can adequately represent the interests of the Power Agencies and their members, and the Power Agencies' participation would be in the public interest.

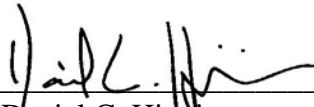
8. Petitioners agree to accept electronic service of all filings in these dockets.

WHEREFORE, for the foregoing reasons, ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1 respectfully request that the Commission:

1. Grant Petitioners' request that they be permitted to intervene and to become parties to this docket;
2. Grant Petitioners' request that they be permitted to file comments and other papers, call and examine witnesses, cross-examine other witnesses and be heard on matters relative to the issues involved in this docket; and
3. For such other and further relief as the Commission deems just and proper.

This the 22nd day of October, 2015.

BURNS, DAY & PRESNELL, P.A.

By: 

Daniel C. Higgins
P.O. Box 10867
Raleigh, North Carolina 27605
Telephone: (919)782-1441
E-mail: dhiggins@bdppa.com
Attorneys for the Power Agencies


NORTH CAROLINA

VERIFICATION

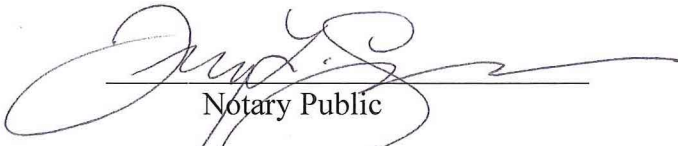
WAKE COUNTY

Andrew M. Fusco, being first duly sworn, deposes and says that he is Vice President, Member Service and Corporate Planning of Electricities of North Carolina, Inc., a Petitioner, that he has read the foregoing Petition and that the same is true of his own knowledge, except as to those matters and things therein alleged upon information and belief, which he believes to be true.

This the 20th day of October, 2015.



Sworn to and subscribed before me,
this the 20th day of October, 2015.



Notary Public

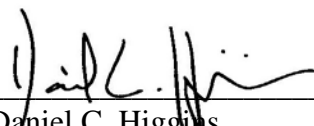
My Commission expires: *June 17, 2018*



CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was duly served upon counsel of record for all parties to these dockets by either depositing same in a depository of the United States Postal Service, first-class postage prepaid, addressed as shown below, or by electronic delivery, this the 22nd day of October, 2015.

BURNS, DAY & PRESNELL, P.A.



Daniel C. Higgins
Post Office Box 10867
Raleigh, NC 27605
Tel: (919) 782-1441