

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH DOCKET NO. E-100, SUB 167**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Biennial Determination of)
Avoided Cost Rates for Electric Utility) PETITION TO INTERVENE
Purchases from Qualifying Facilities – 2020)

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, and the Commission's Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing ("Order") issued on August 13, 2020 in the above-referenced docket. the North Carolina Small Hydro Group (“NC Small Hydro Group” or “Petitioner”), petitions the Commission for leave to intervene in above-captioned proceeding.

In support of this petition, NC Hydro states the following.

1. The name, mailing address, and email address of the Petitioner is:

NC Small Hydro Group
c/o Kevin D. Edwards
Piedmont Hydro Technologies, LLC
916 Comer Road
Stoneville, NC 27048
kevindedwards@gmail.com

2. The name, address, and email of Petitioner’s attorney are:

M. Gray Styers, Jr.
Fox Rothschild LLP
434 Fayetteville Street, Suite 2800
Raleigh, North Carolina 27601
gstyers@foxrothschild.com

3. The NC Small Hydro Group is a group of small hydroelectric power generating companies who have an interest in promoting the common interests of clean energy businesses in North Carolina by generating power using renewable energy resources and creating jobs. They operate small hydroelectric generating facilities in North Carolina that range in size from approximately 200 kW to 5 MW and sell their power to the electric utilities in North Carolina at the avoided cost rates that are the subject of this docket

4. In the Commission's Order, the Commission directed the electric utilities to file a set of proposed rates for purchases from qualifying facilities, showing all calculations for deriving and proposed standard form(s) of contract between the qualifying facilities and the utility. These avoided cost rates and forms of contract directly affect the members of the NC Small Hydro Group.

5. NC Small Hydro Group's participation in this docket may also bring critical insight, knowledge, and understanding to this proceeding that may not otherwise be available from other parties.

6. NC Small Hydro Group requests that any notices, filings, or other communications in this docket be served on the following:

M. Gray Styers, Jr.
Fox Rothschild LLP
434 Fayetteville Street, Suite 2800
Raleigh, North Carolina 27601
gstyers@foxrothschild.com
Telephone: 919-755-8741

And

NC Small Hydro Group
c/o Kevin D. Edwards
Piedmont Hydro Technologies, LLC
916 Comer Road
Stoneville, NC 27048
kevindedwards@gmail.com

7. Pursuant to Commission Rule R1-39, NC Small Hydro Group's counsel agrees to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, NC Small Hydro Group respectfully requests that the Commission grant Petitioner's request that it be permitted to intervene and participate fully as a party to this docket.

Respectfully submitted this 8th day January, 2021.

FOX ROTHSCHILD LLP



BY: _____
M. Gray Styers, Jr.
434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
Telephone: 919-755-8741
E-mail: gstyers@foxrothschild.com
Attorneys for North Carolina Hydro Group

STATE OF NORTH CAROLINA

COUNTY OF Guilford

VERIFICATION

I, Kevin D. Edwards, being first duly sworn, depose and say that I am duly authorized to act on behalf of the North Carolina Small Hydro Group, the Petitioner, and do hereby declare that I am duly authorized to act on behalf of the Petitioner, that I have read the foregoing Petition to Intervene and that the same is true and accurate to my personal knowledge and belief.

This 7th day of January, 2021.



Kevin D. Edwards
on behalf of North Carolina Small Hydro Group

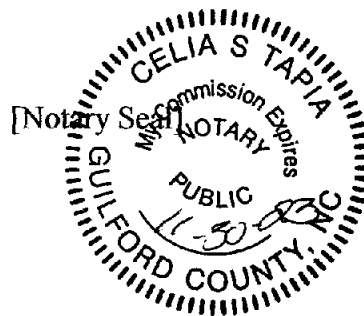
Sworn to and subscribed before me
this 7th day of January, 2021



Notary Public (signature)

Celia S. Tapia
Notary Public (printed)

My Commission expires: November 30, 2023



CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Petition to Intervene has been duly served upon all persons on the docket service list by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery with the party's consent.

This the 8th day of January, 2021.

FOX ROTHSCHILD LLP



BY: _____

M. Gray Styers, Jr.

Attorneys for North Carolina Hydro Group