

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 165

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

2020 Biennial Integrated Resource Plans
and Related 2020 REPS compliance Plans

PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, Broad River Energy, LLC (“Broad River” or “Petitioner”), petitions the Commission for leave to intervene in above-captioned proceeding.

In support of this petition, Broad River states the following.

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

Broad River Energy LLC.
c/o Samuel M. Warfield
1700 City Plaza Drive, Suite 400
Spring, Texas 77389
swarfield@arroyoenergygroup.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. Broad River operates an 850 MW simple-cycle gas-fired electric generation facility in Gaffney, South Carolina. It has an existing purchase power agreement with Duke Energy Progress. This facility is a significant supply resource for

available energy and capacity to help meet long-term electric power demand in North Carolina.

4. Broad River has a direct and substantial interest in the integrated resource planning process to the extent that it may affect how this facility will be utilized as part of available generation resources to meet that demand and how Broad River further invests in, and makes plans for the future of, its facility. Therefore, the Commission's ruling in this docket may have direct and substantial consequences for Broad River.

5. Broad River'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. Broad River 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

7. Pursuant to Commission Rule R1-39, Broad River's counsel agrees to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, Broad River 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 11th day January, 2021.

FOX ROTHSCHILD LLP

A handwritten signature in blue ink, reading "M. Gray Styers, Jr." with a stylized flourish at the end.

BY: _____
M. Gray Styers, Jr.
434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
Telephone: 919-755-8741
E-mail: gstyers@foxrothschild.com
Attorneys for Broad River Energy LLC

STATE OF TEXAS

COUNTY OF Harris

VERIFICATION

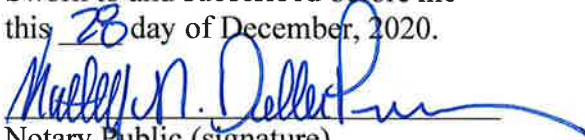
I, Samuel M. Warfield, being first duly sworn, depose and say that I am the Vice President of Broad River Energy, LLC, the Petitioner, and do hereby declare that I am duly authorized to act on behalf of the Petitioner, that I have read the foregoing Petition to Intervene and that the same is true and accurate to my personal knowledge and belief.

This 28 day of December, 2020.



Samuel M. Warfield
Broad River Energy LLC

Sworn to and subscribed before me
this 28 day of December, 2020.



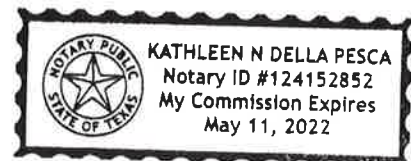
Notary Public (signature)

Kathleen N. Della Pesca

Notary Public (printed)

My Commission expires: May 11, 2022

[Notary Seal]



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 11th day of January, 2021.

FOX ROTHSCHILD LLP

A handwritten signature in blue ink, reading "M. Gray Styers, Jr." with a stylized flourish at the end.

BY: _____
M. Gray Styers, Jr.
Attorneys for Broad River Energy LLC