

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-7, SUB 1155

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	PETITION TO INTERVENE OF
Application of Duke Energy Carolinas, LLC)	PUBLIC SERVICE COMPANY OF
for Approval of Residential New Construction)	NORTH CAROLINA,
Program)	INCORPORATED

PETITION TO INTERVENE

NOW COMES Public Service Company of North Carolina, Incorporated, d/b/a Dominion Energy North Carolina (hereinafter “PSNC” or “Petitioner”), and petitions the Commission, pursuant to Commission Rule R1-19, for leave to intervene in this docket.

In support of its Petition, Petitioner states the following:

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

Public Service Company of North Carolina, Incorporated, d/b/a
 Dominion Energy North Carolina
 800 Gaston Road
 Gastonia, North Carolina 28056

2. The name and address of Petitioner's attorney in this matter is:

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

3. PSNC is a corporation organized and existing under the laws of the State of South Carolina. PSNC operates a natural gas pipeline system for the transportation, distribution, and sale of natural gas within a franchised service area consisting of all or

parts of twenty-eight (28) counties in central and western North Carolina as designated in certificates of public convenience and necessity issued by the Commission. PSNC is a local distribution company (“LDC”) engaged in providing natural gas utility service to the public and is a “public utility” as defined in N.C. Gen. Stat. § 62-3(23), subject to the jurisdiction of the Commission. PSNC is an indirect subsidiary of Dominion Energy, Inc., a Virginia corporation and a “holding company” as defined in the Public Utility Holding Company Act of 2005.

4. PSNC requests 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
Tel. 919-782-1441
dhiggins@bdppa.com

and

B. Craig Collins
Associate General Counsel
Dominion Energy Southeast Services, Inc.
Mail Code C222
110 Operation Way
Cayce, South Carolina 29033-3701
Tel. 803-217-7513
b.collins@dominionenergy.com

5. This docket concerns the proposed Residential New Construction Program (“RNC Program”) filed by Duke Energy Carolinas, LLC (“DEC”) in September 2017. PSNC and other natural gas companies thereafter expressed concerns regarding the competitive impact of the proposed RNC Program to DEC. In June 2019, citing conversations with the natural gas companies, DEC filed its Motion to Withdraw asking

that the Commission allow withdrawal of the application for approval of the RNC Program.

6. The Commission held a hearing on the RNC Program in January 2020. As noted in the resulting Order Holding In Abeyance Decision On Motion to Withdraw Program And Requiring Filing Of Proposed Modified Program (“Abeyance Order”) issued in this docket on June 23, 2020, “the Commission’s challenge is to balance the benefits of expanding an electric energy efficiency program that is supported by statutory mandate and that has proven to be successful in DEP’s service area with the need to prevent unfair or destructive competition between electric utilities such as DEC and natural gas LDCs.” (Order pp. 7-8). In the Abeyance Order, the Commission found “good cause to allow the LDCs and Public Staff to file comments on DEC’s proposed modified RNC Program within 30 days after DEC files said modified Program.” (Order p. 8).

7. DEC filed a revised version of its proposed RNC Program on September 21, 2020 (“Revised RNC Program”). The Revised RNC Program now proposed by DEC does not alleviate or adequately address PSNC’s concerns regarding the nature and extent to which the program would encourage fuel switching and/or promote unfair competition. While PSNC intends to file comments as provided for in the Abeyance Order, it seeks to intervene in order to be able to fully participate in this docket.

8. No other party can adequately represent the interests of PSNC and PSNC’s participation would be in the public interest.

9. PSNC agrees to accept electronic service of all filings in these dockets.

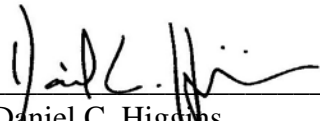
WHEREFORE, for the foregoing reasons, Public Service Company of North

Carolina, Inc., d/b/a Dominion Energy North Carolina respectfully requests that the Commission:

1. Grant Petitioner's request that it be permitted to intervene and to become party to this docket;
2. Grant Petitioner's request that it 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 14th day of October, 2020.

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 Public Service Company
of North Carolina, Inc., d/b/a Dominion
Energy North Carolina

NORTH CAROLINA

VERIFICATION

GASTON COUNTY

M. Shaun Randall being first duly sworn, deposes and says that he is Vice President – Gas Operations of Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina, the 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 12th day of October, 2020.

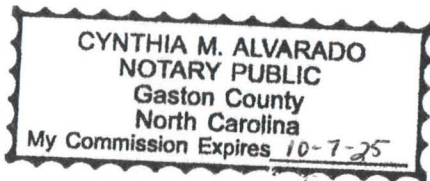


Sworn to and subscribed before me,
this the 12th day of October, 2020.



Notary Public

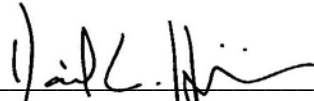
My Commission expires: October 7, 2025



CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was duly served upon counsel of record for the Public Staff and all parties or record to this docket 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 14th day of October, 2020.

BURNS, DAY & PRESNELL, P.A.



Daniel C. Higgins
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Raleigh, NC 27605
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