

OFFICIAL COPY

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FILED

AUG 16 2017

Clerk's Office
N.C. Utilities Commission

August 16, 2017

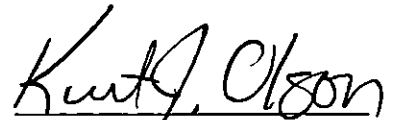
HAND DELIVERY

Ms. Martha Lynn Jarvis
Chief Clerk
Office of the Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

Re: Docket E-100, Sub 150

Dear Ms. Jarvis:

Enclosed please find an original and thirty (30) copies of the North Carolina Pork Council's Motion to Intervene in the above referenced docket. By copy of this letter, all parties of record are being served.



Kurt J. Olson, Esq.
Counsel for NC Pork Council

cc: Counsel of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

FILED

DOCKET NO. E-100, SUB 150

AUG 16 2017

Clerk's Office
N.C. Utilities Commission

IN THE MATTER OF:
RULEMAKING PROCEEDING
TO IMPLEMENT G.S. 62-110.8

)
) MOTION TO INTERVENE
)

MOTION TO INTERVENE

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7 and R1-19, the North Carolina Pork Council (the "Pork Council" or "Council") hereby moves to intervene in the above referenced docket. In support of its motion, the Pork Council states as follows:

1. The Pork Council is a non-profit organization with its principle place of business in Raleigh, North Carolina. The Council's primary mission is to develop and promote a socially responsible and profitable pork industry in the State. The Pork Council seeks to achieve these objectives through education and research, and by advancing sound public policy in areas of concern.

2. The Pork Council represents the interests of more than 46,000 North Carolina citizens who work full-time in the pork industries. Agriculture is North Carolina's largest industry and pork production is the second largest sector in that industry. North Carolina's pork industry also ranks second in the United States. At the same time, over 80 percent of North Carolina's hog farms are owned and operated by individual farm families. Many of these farms have been passed on from generation to generation and over time these operations have contribute significantly to the quality of life in their respective communities forming a vital part

of North Carolina's economy and way of life. The Pork Council provides meaningful leadership in this very important and dynamic industry.

3. In this the docket, the North Carolina Utilities Commission ("Commission") has started the process to implement certain parts of recently enacted S.L. 2017-192, an act that overhauls North Carolina's renewable energy initiative. Specifically, new G.S. § 62-110.8 mandates the use of a competitive bidding process to attain certain renewable energy goals. The rules implementing this process will influence the development of renewable energy in North Carolina for years to come.

4. The generation of renewable energy as a by-product of hog farming, once theoretical, is now a reality and on the cusp of becoming a key component of raising hogs in North Carolina. Indeed, many leading waste management technologies adopted by North Carolina's hog producers capture methane that in turn is used in a variety of ways to produce energy, from the on-farm generation of electricity to the large-scale distribution and use as a substitute or alternative to fossil-derived natural gas in multiple applications. The rules being considered in this docket will directly impact these activities. For that and other reason, the Pork Council and its constituents have a direct, vested interest in this proceeding.

5. The Council's address is 2300 Rexwoods Drive, Suite 340, Raleigh, North Carolina 27607. All correspondence should be sent to:

Ms. Angie Whitener Maier
Director of Policy Development and Communications
2300 Rexwoods Drive, Suite 340
Raleigh, NC 27607
(919) 781-0361
angie@ncpork.org

with copies to:

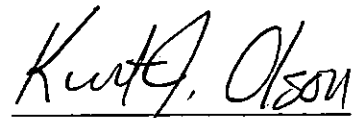
Kurt J. Olson, Esq.

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6. Pursuant to Commission Rule R1-39, the Pork Council agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, the Pork Council prays that it be allowed to intervene in this matter.

Respectfully submitted this the 16th day of August 2017.

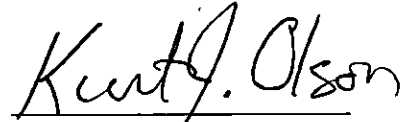


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CERTIFICATE OF SERVICE

I hereby certify that all person on the docket service list have been served true and accurate copies of the foregoing Motion to Intervene by first class mail deposited in the U.S. mail, postage pre-paid or by email transmission with the party's consent.

Respectfully submitted this the 16th day of August 2017.

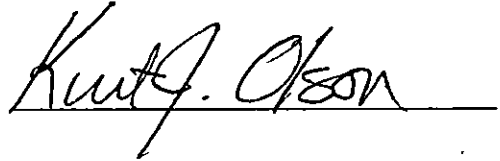
A handwritten signature in black ink that reads "Kurt J. Olson". The signature is written in a cursive style with a horizontal line underneath the name.

Kurt J. Olson, Esq.
Attorney for the North
Carolina Pork Council
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VERIFICATION

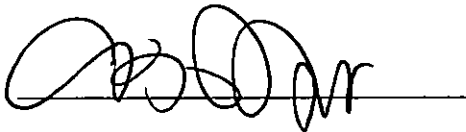
Kurt J. Olson, being first duly sworn, deposes and says that he is Counsel for the North Carolina Pork Council in the Docket E-100, Sub 150; and that he has read the foregoing Motion to Intervene and that the statement and representations made therein are true and accurate to the best of his knowledge, except as to matters and things stated on information and belief, and as to those matters, he believes them to be true.

This the 16th day of August, 2017.

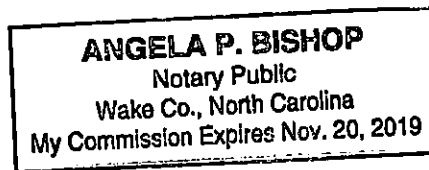


Sworn to and subscribed before me

this the 16th day of August 2017



NOTARY PUBLIC



My Commission Expires: 11-20-19