# STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 1262 DOCKET NO. E-7, SUB 1243

### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	) PETITION TO INTERVENE OF
Joint Petition of Duke Energy Carolinas, LLC,	THE CAROLINA INDUSTRIAL
and Duke Energy Progress, LLC for Issuance	GROUP FOR FAIR UTILITY
of Storm Recovery Financing Orders	RATES II and III

NOW COME the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and III (CIGFUR III) (collectively, CIGFUR), by and through the undersigned counsel, pursuant to Commission Rules R1-5, R1-7, and R1-19, and the Commission's November 6, 2020 Order Scheduling Hearing, Requiring Filing of Testimony, and Establishing Discovery Guidelines, and respectfully submit this petition to intervene. In support of this petition, CIGFUR shows as follows:

- CIGFUR II is an association of purchasers of electric power from Duke Energy Progress, LLC ("DEP"). CIGFUR II's mailing address is Post Office Box 1351, Raleigh, North Carolina, 27602-1351. CIGFUR II may be contacted by email through its counsel at <a href="mailto:cress@bdixon.com">ccress@bdixon.com</a>.
- CIGFUR III is an association of purchasers of electric power from Duke Energy Carolinas, LLC ("DEC"). CIGFUR III's mailing address is Post Office Box 1351, Raleigh, North Carolina, 27602-1351. CIGFUR III may be contacted by email through its counsel at <a href="mailto:ccress@bdixon.com">ccress@bdixon.com</a>.

- As purchasers of electric power from DEP and DEC, respectively, CIGFUR II
  and CIGFUR III have direct, substantial, and pecuniary interests in this
  proceeding.
- CIGFUR's participation in this docket will bring the important perspective of high load factor ratepayers of DEP and DEC.
- 5. Pursuant to Commission Rule R1-39, CIGFUR consents to electronic service of all pleadings and other papers filed in these dockets.

WHEREFORE, CIGFUR respectfully requests to be allowed to intervene in the above-captioned dockets.

Respectfully submitted, this the 17th day of December, 2020.

# CIGFUR II & III

/s/ Christina D. Cress Christina D. Cress Bailey & Dixon, LLP PO Box 1351 Raleigh, NC 27602 919-828-0731 ccress@bdixon.com

#### **VERIFICATION**

Christina Cress, first being duly sworn, deposes and says that she is the attorney for CIGFUR II and III; that she has read the foregoing Petition to Intervene and that same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of CIGFUR II and III.

December 17, 2020

y: Christina Cress

STATE OF NORTH CAROLINA

**COUNTY OF WAKE** 

Sworn to and subscribed before me, via live videoconference, this the 17<sup>th</sup> day of December, 2020. I signed this notarial certificate on the 17<sup>th</sup> day of December, 2020, according to the emergency video notarization requirements set forth in G.S. § 10B-25.

Notary Public

Typed or Printed Notary Name

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My Commission Expires: 03-04-2023

## **CERTIFICATE OF SERVICE**

The undersigned attorney for CIGFUR II & III hereby certifies that she caused the foregoing *Petition to Intervene of CIGFUR II & III* to be served upon the parties of record in this proceeding by electronic mail.

This the 17th day of December, 2020.

/s/ Christina D. Cress Christina D. Cress Bailey & Dixon, LLP PO Box 1351 Raleigh, NC 27602 919-828-0731 ccress@bdixon.com