

SOUTHERN ENVIRONMENTAL LAW CENTER

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December 1, 2020

Via Electronic Filing

Ms. Kim Campbell
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

Re: In the Matter of: Biennial Determination of Avoided Cost Rates for
Electric Utility Purchases from Qualifying Facilities – 2020

Dear Ms. Campbell:

I attach a Petition to Intervene for filing on behalf of Southern Alliance for Clean Energy in the above-referenced docket, and request that the Commission accept the petition for filing despite the absence of the verification required by Commission rules. Our office is closed due to the coronavirus pandemic and our staff, including paralegals with notary credentials, are working remotely. A verification will be filed as soon as practicable and safe for our staff to execute the document in the presence of a notary public.

Please let me know if you have any questions about this filing.

Sincerely,

s/ Lauren Bowen

LB
Enclosures
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 167

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

PURSUANT TO Commission Rule RI-19 and the Commission's August 13, 2020 *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing*, Southern Alliance for Clean Energy, through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of its petition:

1. Southern Alliance for Clean Energy (“SACE”) is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is: P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in North Carolina and Georgia, and field offices across the region.
2. SACE and its members have a direct and substantial interest in this proceeding. Many of SACE’s members are customers of North Carolina electric utilities and, therefore, are impacted by the utilities’ energy resource selections and ratemaking practices. SACE and its members are interested in promoting greater reliance on clean, low-cost energy resources to meet North Carolina’s energy needs.
3. SACE has intervened, filed comments, presented expert testimony, and participated in evidentiary hearings in prior biennial avoided cost proceedings, including E-100, Sub 136; E-100, Sub 140; E-100, Sub 148; and E-100, Sub 158.

4. The attorneys for SACE to whom all correspondence and filings in this docket should be addressed are:

Lauren J. Bowen
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

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Service by electronic mail pursuant to NCUC Rule R1-39 is acceptable and should be addressed to lbowen@selcnc.org and njimenez@selcnc.org.

WHEREFORE, SACE requests that it be allowed to intervene in this docket.

Respectfully submitted this 1st day of December, 2020.

s/Lauren J. Bowen
Lauren J. Bowen
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Attorney for Southern Alliance for Clean Energy

CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 1st day of December, 2020.

s/ Lauren J. Bowen
Lauren J. Bowen