

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 165

In the Matter of:) **PETITION TO INTERVENE**
2020 Biennial Integrated Resource Plan) **BY CITY OF CHARLOTTE**

PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7, and R1-19, the City of Charlotte, through the undersigned attorney, respectfully requests that the North Carolina Utilities Commission enter an order permitting the City of Charlotte to intervene in the above-referenced docket. In support of this petition is the following:

1. The City of Charlotte ("City") is a municipal corporation organized under North Carolina law. Its address is City of Charlotte, 600 East 4th Street, Charlotte, NC 28202.
2. The attorney for the City to whom all correspondence and filings should be addressed is Karen Weatherly, Senior Assistant City Attorney, City Attorney's Office, 600 East 4th Street, Charlotte, NC 28202.
3. Pursuant to Commission Rule R1-39, the City agrees to electronic service of all pleadings and other filings in this matter.
4. The City of Charlotte has an interest in the subject matter of this proceeding. The City Council-approved Strategic Energy Action Plan ("SEAP") sets municipal and city-wide carbon emissions reduction goals centered around energy generation, transportation, buildings, and equitable workforce development. The IRP will have significant implications

for the City's ability to achieve the ambitious SEAP goals. Duke Energy Carolinas is a critical partner in the achievements of these goals, and the 2020 Integrated Resource Plan ("IRP") is an important opportunity to align our low carbon energy efforts. As a result, the City has a clear, direct and substantial interest in the matters to be addressed by the Commission. City participation in this docket will bring municipal government perspective, insight, knowledge, and understanding to the proceeding.

5. Intervention will give the City an opportunity to comment on the Integrated Resource Plan and seek solutions that align with Commission, Duke Energy, and City SEAP goals.

THEREFORE, for the reasons set forth above, the City of Charlotte requests that it be allowed to intervene in this matter.

Respectfully submitted, this the 28th day of January, 2021.

OFFICE OF THE CITY ATTORNEY


Karen Weatherly
Senior Assistant City Attorney
NC State Bar Number 16012
600 East Fourth Street
Charlotte, NC 28202
704-336-5878 Office
704-632-8346 Fax
kweatherly@ci.charlotte.nc.us

VERIFICATION

Karen Weatherly, being duly sworn, deposes and says that she is an attorney for the City of Charlotte; that she has read the foregoing Petition to Intervene and that the 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 the City of Charlotte.

This the 28th day of January, 2021



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Senior Assistant City Attorney
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NORTH CAROLINA
MECKLENBURG COUNTY

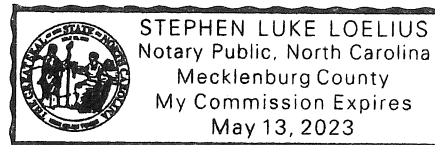
Sworn to and subscribed before me,
This the 28th day of January, 2021.

[AFFIX SEAL OF NOTARY]



Notary Public

My commission Expires: May 13 2023



CERTIFICATE OF SERVICE

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

This the 28th day of January, 2021.



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