

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, Sub 165

In the Matter of
2020 Biennial Integrated Resource Plans and }
Related 2020 REPS Compliance Plans }

PETITION TO INTERVENE

NOW COME ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1 (collectively hereinafter "Petitioners" or "the Power Agencies"), and petition the Commission, pursuant to Commission Rule R1-19, for leave to intervene in this docket.

In support of their Petition, Petitioners state the following:

1. The names and mailing address of the Petitioners are:

ElectriCities of North Carolina, Inc.
North Carolina Eastern Municipal Power Agency
North Carolina Municipal Power Agency Number 1
1427 Meadow Wood Blvd.
Raleigh, N.C. 27604

The name and address of Petitioners' attorney is:

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

3. ElectriCities of North Carolina, Inc. ("ElectriCities") is a joint municipal assistance agency organized pursuant to N.C. Gen. Stat. § 159B-43 by North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1. ElectriCities is a membership organization that provides aid and assistance to its

agency members in connection with the operation of their electric systems. ElectriCities also provides management services to those agencies.

4. North Carolina Eastern Municipal Power Agency ("NCEMPA") is a joint agency organized pursuant to Chapter 159B by its members, which consist of 32 cities and towns located in the portions of eastern North Carolina served by Duke Energy Progress, LLC ("DEP") and Dominion North Carolina.

5. North Carolina Municipal Power Agency Number 1 ("NCMPA1") is a joint agency organized pursuant to Chapter 159B by its members, which consist of 19 cities and towns located in that portion of western North Carolina served by Duke Energy Carolinas, LLC.

6. The Power Agencies request that any notices, filings or other communications with respect to this Petition and proceeding be served on the following:

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

and

Jay Morrison
Chief Legal Officer
ElectriCities of North Carolina, Inc.
1427 Meadow Wood Blvd.
Raleigh, NC 27604
jmorriso@electricities.org

7. The Power Agencies' member municipalities are electric power suppliers who operate distribution systems to supply their end-user residents and retail customers with electric power in various parts of North Carolina. The vast majority of the power NCEMPA's municipal members provide to their customers is purchased from DEP

pursuant to a wholesale contract. The power NCMPA1's municipal members provide to their customers is supplied through NCMPA1's ownership interest in the Catawba Nuclear Station and other owned and contracted resources. In addition, some of the Power Agencies' municipal members own and operate electric generation resources pursuant to authorizations provided by the Commission.

8. As electric power suppliers, the Power Agencies' municipal members have a real and substantial interest in the issues raised in this proceeding. No other party can adequately represent the interests of the Power Agencies and their members, and the Power Agencies' participation in this docket would be in the public interest.

9. By Order issued January 26, 2021, the Commission granted the Power Agencies' request to be allowed to participate in the technical conference to be held in this docket on March 9, 2021.

10. Petitioners agree to accept electronic service of all filings in these dockets.

WHEREFORE, for the foregoing reasons, ElectriCities of North Carolina, Inc., North Carolina Eastern Municipal Power Agency and North Carolina Municipal Power Agency Number 1 respectfully request that the Commission:

1. Grant Petitioners' request that they be permitted to intervene and to become parties to this docket;
2. Grant Petitioners' request that they 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.

Respectfully submitted, this the 24th day of February 2021.

BURNS, DAY & PRESNELL, P.A.

By: 

Daniel C. Higgins

P.O. Box 10867

Raleigh, North Carolina 27605

Telephone: (919)782-1441 [E-](mailto:dhiggins@bdppa.com)

[mail: dhiggins@bdppa.com](mailto:dhiggins@bdppa.com)

Attorneys for the Power Agencies

OFFICIAL COPY

Feb 24 2021

NORTH CAROLINA

VERIFICATION

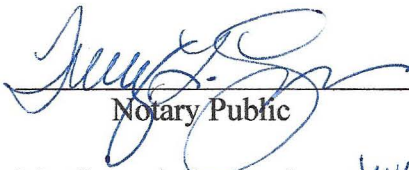
WAKE COUNTY

Andrew M. Fusco, being first duly sworn, deposes and says that he is Vice President, Member Service and Corporate Planning of ElectriCities of North Carolina, Inc., a 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 23rd day of February, 2021.



Sworn to and subscribed before me,
this the 23rd day of February, 2021.


Notary Public

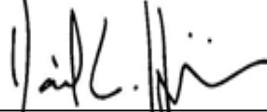


My Commission expires: June 17, 2023

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 to these dockets 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 24th day of February, 2021.

BURNS, DAY & PRESNELL, P.A.



Daniel C. Higgins Post

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