

CRISP & PAGE, PLLC

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OFFICIAL COPY

July 22, 2019

FILED
JUL 22 2019
Clerk's Office
N.C. Utilities Commission

Ms. Janice Fulmore, Deputy Clerk
North Carolina Utilities Commission
Dobbs Building, Fifth Floor
430 North Salisbury Street
Raleigh, North Carolina 27602

Re: Docket No. E-2, Sub 1206; Duke Energy
Progress, LLC's Application for Approval of Demand-
Side Management and Energy Efficiency Cost Recovery Rider

VIA HAND DELIVERY

Dear Ms. Fulmore:

We enclose for filing in the above-referenced matter, on behalf of Carolina Utility Customers Association, Inc. ("CUCA"), an original and 33 copies of CUCA's Petition to Intervene. Kindly date-stamp and return to us via our courier the three additional enclosed copies. Please let me know, at your early convenience, if you have any questions concerning this filing.

Very truly yours,

CRISP & PAGE, PLLC


Robert F. Page

Enclosures

cc: Ms. Sharon Miller
Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1206

In the Matter of)	
)	
Application by Duke Energy Progress, LLC)	
for Approval of Demand Side)	Petition of Carolina Utility Customers
Management and Energy Efficiency Cost)	Association, Inc. to Intervene
Recovery Rider Pursuant to G.S. 62-133.9)	
and NCUC Rule R8-69)	

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, files this Petition pursuant to G.S. 62-72 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") that CUCA be permitted to intervene and participate in the above-captioned proceeding. In support of this petition, CUCA states as follows:

1. CUCA is a corporation duly organized, validly existing, and in good standing under the laws of the State of North Carolina, with its principal office located at Suite 210, Trawick Professional Center, 1708 Trawick Road, Raleigh, North Carolina 27604. The names and addresses of its principal officers are:

Chair: David J. Lyons
Gerdau Long Steel North America
384 Old Grassdale Road NE
Cartersville, GA 30121

Vice Chair: Sean M. Finsel
Moen, Inc.
2609 Cox Mill Road
Sanford, NC 27332-9727

Executive Director: Sharon C. Miller
Carolina Utility Customers Association, Inc.
Suite 210, Trawick Professional Center
1708 Trawick Road
Raleigh, North Carolina 27604
Email: smiller@cucainc.org

2. CUCA's attorney, to whom all communications and pleadings should be addressed, is shown below. Copies of all communications and pleadings should also be served on CUCA's Executive Director Sharon Miller.

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3. CUCA is an organization of industrial utility customers whose member companies maintain numerous industrial manufacturing facilities and employ thousands of workers throughout the State of North Carolina, including the territory in which Duke Energy Progress, Inc. ("DEP") has been authorized by the Commission to sell electricity at retail.

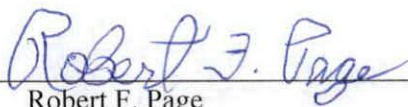
4. CUCA's member companies use electricity sold by DEP in the operation of their manufacturing plants. The availability of an adequate supply of electricity at a reasonable price is critical to the economic viability of CUCA's member companies. DEP's filing will affect the rates associated with DEP's sale of electricity to CUCA members. As a result, CUCA has a vital interest in the matters at issue in the above-captioned proceeding and should be permitted to intervene and participate.

5. CUCA agrees to accept electronic service of all filings in the Docket.

WHEREFORE, CUCA respectfully requests that the Commission enter an order allowing CUCA to intervene and fully participate in the above-captioned proceeding, including the right to discovery, and to otherwise exercise all statutory rights provided to Intervenors under North Carolina law.

This the 22nd day of July, 2019.

CRISP & PAGE, PLLC

By: 
Robert F. Page
N.C. State Bar No. 3307
4010 Barrett Drive, Suite 205
Raleigh, NC 27609
(919) 791-0009 Telephone
(919) 791-0010 Fax
rpage@crisppage.com Email

CERTIFICATE OF SERVICE

I, the undersigned counsel for CUCA, do hereby certify that a copy of the foregoing Petition to Intervene was served upon all parties of record in this proceeding, or their legal counsel, by electronic mail.

This the 22nd day of July, 2019.


Robert F. Page

Electronic Service List

Mr. Lawrence B. Somers, Duke Energy Corporation – bo.somers@duke-energy.com
Ms. Kendrick Fentress, Duke Energy Corporation – Kendrick.Fentress@duke-energy.com
Mr. David Tsai, Progress Energy Carolinas – David.Tsai@duke-energy.com
Ms. Dawn Sutton, Duke Energy Progress – dawn.sutton@duke-energy.com
Mr. Robert W. Kaylor, Law Office of Robert W. Kaylor – bkaylor@rwkaylorlaw.com
Mr. Brett Breitschwerdt, McGuire Woods, LLP – bbreitschwerdt@mcguirewoods.com
Mr. David T. Drooz, Public Staff-NCUC – david.drooz@psncuc.nc.gov
Mr. Gudrun Thompson, Southern Environmental Law Center – gthompson@selcnc.org
Mr. David Neal, Southern Environmental Law Center – dneal@selcnc.org

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF WAKE

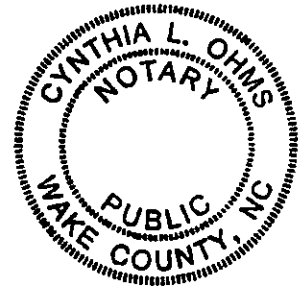
Sharon C. Miller, being duly sworn, deposes and says that she is the Executive Director of Carolina Utility Customers Association, Inc., the Intervenor herein; that she has read the foregoing Petition of Carolina Utility Customers Association, Inc., to Intervene, and knows the contents thereof, and that the same is true of her own knowledge, except as to those matters herein state upon information and belief, and as to those, she believes them to be true; and that this verified petition be used as an affidavit.

This the 22nd day of July, 2019.

Sharon C. Miller
SHARON C. MILLER

SWORN to and subscribed before me,
This the 22nd day of July, 2019.

Cynthia L. Ohms
Notary Public



My Commission Expires: 2-3-2020