## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-2, SUB 1297 DOCKET NO. E-7, SUB 1268

In the Matter of:	
Duke Energy Progress, LLC, and Duke )	NCSEA'S PETITION TO
Energy Carolinas, LLC, 2022 Solar)	INTERVENE
Procurement Pursuant to Session Law )	
2021-165, Section 2(c)	

## NCSEA'S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association ("NCSEA") hereby petitions to intervene in the above-referenced dockets. In support of this petition, NCSEA states as follows:

- 1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA's mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
- 2. NCSEA was actively involved in the negotiations that led to House Bill 951 and Session Law 2021-165, which amended G.S. 62-110.8. NCSEA also intervened and filed comments, reply comments, and supplemental reply comments in Docket No. E-100, Sub 150 which established the rules governing the House Bill 589 competitive procurement of renewable energy ("CPRE") program and intervened and provided multiple comment sets in Docket Nos. E-2, Sub 1159 & E-7, Sub 1156, which implemented the CPRE

program. In addition, many of NCSEA's members are developers of renewable energy projects that have substantial interest in the competitive procurement of renewable energy program filed in this proceeding and authorized by G.S. 62-110.8. As such, NCSEA has an interest in ensuring that the amended statute is implemented according to the intent of the legislature.

- 3. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.
- 4. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609.

  All correspondence related to this proceeding should be addressed to:

Peter H. Ledford Benjamin Smith General Counsel Assistant General Counsel **NCSEA NCSEA** 4800 Six Forks Road 4800 Six Forks Road Suite 300 Suite 300 Raleigh, NC 27609 Raleigh, NC 27609 (919) 832-7601 Ext. 107 (919) 832-7601 Ext. 111 peter@energync.org ben@energync.org

5. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

**WHEREFORE,** for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted,

eter H. Ledford

N.C. State Bar No. 42999

General Counsel

NCSEA

4800 Six Forks Road

Suite 300

Raleigh, NC 27609

(919) 832-7601 Ext. 107

peter@energync.org

## **VERIFICATION**

Peter Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 16th day of March, 2022.

NORTH CAROLINA **WAKE COUNTY** 

Sworn to and subscribed before me,

this the day of March, 2022.

[AFFIX SEAL OF NOTARY]

Printed Name of Notary Public

My Commission Expires: October 11, 2022

JACQUIL TOON Notary Public, North Carolina Wake County Commission Expires October 11, 2022

## 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 16th day of March, 2022.

eter H. Ledford

N.C. State Bar No. 42999

General Counsel

NCSEA

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