

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 176**

In the Matter of:)	
Petition to Revise Commission Rules)	PETITION OF NCSEA TO
R8-63 and R8-64)	INTERVENE

PETITION OF NCSEA 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-captioned docket. 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.

3. NCSEA has numerous members who frequently apply for certificates of public convenience and necessity (“CPCNs”) pursuant to Commission Rules R8-63 and R8-64, which the Public Staff – North Carolina Utilities Commission seeks to amend in this proceeding.

4. NCSEA has previously appeared as an intervenor in matters before this Commission related to CPCN rulemaking. *See, e.g.*, Commission Docket No. E-100, Sub 166; Commission Docket No. E-100, Sub 134.

4. NCSEA’s participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

5. NCSEA’s address is 4800 Six Forks Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford
General Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
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Benjamin W. Smith
Regulatory Counsel for NCSEA
4800 Six Forks Road
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6. 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 this the 26th day of August, 2021.

/s/ Benjamin W. Smith
Benjamin W. Smith
Regulatory Counsel for NCSEA
4800 Six Forks Road
Suite 300
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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is an 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 26 day of August, 2021.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 25 day of August, 2021.



[AFFIX SEAL OF NOTARY]



Notary Public

Sarah R. McQuillan
Printed Name of Notary Public
My Commission Expires: 5/30/2026

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document 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 26th day of August, 2021.

/s/ Benjamin W. Smith
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