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November 24, 2008

VIA HAND DELIVERY

OFFICIAL COPY

Ms. Renne Vance
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918

FILED

NOV 24 2008

Clerk's Office
N.C. Utilities Commission


Re: Docket No. E-2, Sub 936 (Application by Carolina Power and Light Company, d/b/a, Progress Energy Carolinas, Inc., for Approval of Residential Home Energy Improvement Program), and Docket No. E-2, Sub 938 (Application by Carolina Power and Light Company, d/b/a Progress Energy Carolinas, Inc. Commercial, Industrial, Governmental Energy Efficiency Program).

Dear Ms. Vance:

Enclosed for filing in the above-referenced dockets are the original and 30 copies of the Petition to Intervene by the Southern Environmental Law Center, on behalf of itself, the Natural Resources Defense Council, and the Southern Alliance for Clean Energy. By copy of this letter and enclosures I am serving the parties of record on the service list.

Clerk-As
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7Comm
Bennink
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Watson
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Jones
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2/5 Ec/Res
3/5 Ec/Res

Yours truly,


Gudrun Thompson, NC Bar No. 28829
Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

Enclosures
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, Sub 936

DOCKET NO. E-2, Sub 938

DOCKET NO. E-2, Sub 936

In the Matter of :

Application by Carolina Power and Light
Company, d/b/a, Progress Energy
Carolinas, Inc., for Approval of
Residential Home Energy Improvement
Program

And

DOCKET NO. E-2, Sub 938

In the Matter of:

Application by Carolina Power and Light
Company, d/b/a Progress Energy
Carolinas, Inc. Commercial, Industrial,
Governmental Energy Efficiency Program

FILED

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Clerk's Office
N.C. Utilities Commission

PETITION TO INTERVENE

PURSUANT TO NCUC Rules R1-19 and R8-68(d), the Southern Environmental Law Center ("SELC"), on behalf of itself, the Natural Resources Defense Council ("NRDC"), and the Southern Alliance for Clean Energy ("SACE") files this petition to intervene in this docket. In support of this petition, the Southern Environmental Law Center states as follows:

1. SELC is a non-profit regional environmental organization, organized under the laws of the State of North Carolina. SELC is dedicated to the protection of natural resources in North Carolina and throughout the Southeast. SELC works to protect the health of North Carolina residents, including the organization's 900

individual members in the state, by advocating for energy conservation and efficiency policies and for emissions reductions at electric utility plants in North Carolina. The address of SELC's Carolinas Office is: Southern Environmental Law Center, 200 W. Franklin St., Suite 330, Chapel Hill, NC, 27516.

2. SELC has members who are customers of Progress Energy Carolinas. SELC and its members are interested in promoting greater reliance on energy conservation and efficiency measures to meet North Carolina's energy needs.

3. SELC seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy efficiency are represented.

4. NRDC is a nonprofit corporation organized under the laws of the State of New York. NRDC is a national environmental organization with over 30 years experience working on state energy policy, including utility regulation and energy efficiency. NRDC has a strong interest in ensuring that North Carolina adopts environmentally sound and sustainable energy policies.

5. NRDC's members include customers of Progress Energy Carolinas who use electric power in their homes and businesses. NRDC and its members are interested in promoting greater reliance on energy conservation and efficiency resources to meet North Carolina's energy needs.

6. NRDC seeks to intervene in this proceeding in order to promote cost-effective energy efficiency while protecting the environment.

7. SACE is a nonprofit corporation organized under the laws of the State of Tennessee. The North Carolina Office of SACE is located at 29 North Market Street, Suite 409, Asheville, NC 28801. One purpose of SACE is to advocate for


energy planes, policies and systems that best serve the environmental, public health, and economic interests of the communities in the Southeast.

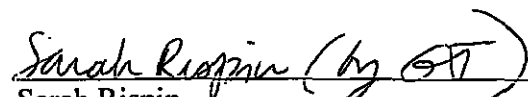
8. SACE has members who are customers of Progress Energy Carolinas. SACE and its members are interested in promoting greater reliance on energy conservation and efficiency to meet North Carolina's energy needs.

9. SACE seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy efficiency are represented.

WHEREFORE, Southern Environmental Law Center, Natural Resources Defense Council, and Southern Alliance for Clean Energy pray that they be allowed to intervene in this matter.

Respectfully submitted this 24th day of November, 2008.


Gudrun Thompson, NC Bar No. 28829
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Attorneys for Southern Environmental Law Center

CERTIFICATE OF SERVICE

I hereby certify that the following persons on the docket mailing list have been served with Southern Environmental Law Center's Petition to Intervene on behalf of itself, Natural Resources Defense Council, and Southern Alliance for Clean Energy, by deposit in the U.S. Mail, postage prepaid:

Len S. Anthony
Deputy General Counsel
Progress Energy Carolinas, Inc., Carolina
Power and Light Co.
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Leonard G. Green
Assistant Attorney General
Attorney General's office
Utilities Section
PO Box 629
Raleigh, NC 27602-0629

Sharon Miller
Carolina Customer Association
Trawick Professional Center, Suite 210
1708 Trawick Road
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Robert Page
Crisp, Page, Currin, L.L.P., Suite 205
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Kurt Olson
NC Sustainable Energy Association
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Brown, Crump, Vanore & Tierney
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Raleigh, NC 27601

Lara Nichols
Duke Energy Corporation
526 South Church Street (EC032)
Charlotte, NC 28202

This 24th day of November, 2008.

Tessa Hansen (with express permission by KI)
Tessa Hansen
Legal Assistant

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, Sub 936

DOCKET NO. E-2, Sub 938

DOCKET NO. E-2, Sub 936

In the Matter of:

Application by Carolina Power and
Light Company, d/b/a, Progress
Energy Carolinas, Inc. for Approval
of Commercial, Industrial,
Governmental Energy Efficiency
Program

AND

DOCKET NO. E-2, Sub 938

In the Matter of:

Application by Carolina Power and
Light Company, d/b/a, Progress
Energy Carolinas, Inc., for Approval
of Residential Home Energy
Improvement Program

VERIFICATION

I, Gudrun Thompson, Attorney for the Southern Environmental Law Center, verify that the contents of the Southern Environmental Law Center's Petition to Intervene in these matters on behalf of itself, National Resources Defense Council, and Southern Alliance for Clean Energy, are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of the above-mentioned petitioners.

State of North Carolina
County of Orange


Gudrun Thompson

Date 11/24/08

Sworn to and subscribed before me,
the 24th day of November, 2008.



Notary Public

Lou Ann Phelps, Notary Public

My commission expires: October 25, 2011

LOU ANN PHELPS
Notary Public, North Carolina
Durham County
My Commission Expires
October 25, 2011