

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1204**

<b>In the Matter of:</b>	)	
<b>Application of Duke Energy</b>	)	<b>PETITION OF NCSEA TO</b>
<b>Progress, LLC R8-55 Relating to</b>	)	<b>INTERVENE</b>
<b>Fuel and Fuel-Related Charge</b>	)	
<b>Adjustments for Electric Utilities</b>	)	

**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-referenced 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.
2. Many of NCSEA's members are customers of Duke Energy Progress, LLC.
3. NCSEA has frequently appeared before this Commission as an intervenor in fuel and fuel-related cost recovery proceedings. *See, e.g.*, Commission Docket No. E-2, Sub 1173; Commission Docket No. E-2, Sub 1146; Commission Docket No. E-2, Sub 1107; Commission Docket No. E-2, Sub 1069; Commission Docket No. E-2, Sub 1045; Commission Docket No. E-2, Sub 1031; Commission Docket No. E-2, Sub 1018; and Commission Docket No. E-2, Sub 1001.

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  
General Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

Benjamin W. Smith  
Regulatory Counsel for NCSEA  
4800 Six Forks Road  
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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,

/s/ Peter H. Ledford  
Peter 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 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 9<sup>th</sup> day of August, 2019.

  
\_\_\_\_\_  
Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 9<sup>th</sup> day of August, 2019.

[AFFIX SEAL OF NOTARY]

  
\_\_\_\_\_  
Notary Public

**Daniel G Brookshire, Notary Public  
Orange County, North Carolina  
My Commission Expires 7/2/2022**

  
Printed Name of Notary Public  
My Commission Expires: 7/2/2022

**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 9<sup>th</sup> day of August, 2019.

          /s/ Peter H. Ledford            
Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
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