

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 165**

In the Matter of:)	
In the Matter of 2020 Biennial Integrated)	PETITION OF NCSEA TO
Resource Plans and Related 2020 REPS)	INTERVENE
Compliance Plans)	

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 motion, 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. The Commission's ruling in this docket will have broad implications for both NCSEA and its members. NCSEA was a chief proponent of North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) and has a direct and substantial interest in its implementation to assure that the policies and goals of the REPS are achieved in a manner consistent with the legislative intent.
3. NCSEA’s participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. NCSEA has frequently appeared before this Commission as an intervenor and NCSEA's interest in cases such as this one has been recognized by the Commission. *See, e.g.,* Commission Docket No. E-100, Sub 157; Commission Docket No. E-100, Sub 147; Commission Docket No. E-100, Sub 141; Commission Docket No. E-100, Sub 137; Commission Docket No. E-100, Sub 131; Commission Docket No. E-100, Sub 128; Commission Docket No. E-100, Sub 118; and Commission Docket No. E-100, Sub 113.

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

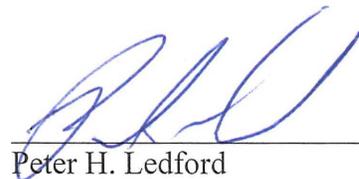
Peter H. Ledford
General Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

Benjamin Smith
Regulatory Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 111
Ben@energync.org

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,



Peter H. Ledford
General Counsel for NCSEA
N.C. State Bar No. 42999
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 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 28th day of May, 2020.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 28 day of May, 2020.

[AFFIX SEAL OF NOTARY]



Notary Public



Victoria Prince Somol

Printed Name of Notary Public
My Commission Expires: 5-22-2022

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 28th day of May, 2020.



Peter H. Ledford
General Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org