

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. M-100, SUB 163

In the Matter of:)
Investigation Regarding the Ability of) NCSEA’S PETITION TO
North Carolina’s Electricity, Natural Gas,) INTERVENE
and Water/Wastewater Systems to Operate)
Reliably During Extreme Cold Weather)

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 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. NCSEA’s membership includes wind energy developers and component manufacturers. The Public Staff’s *Petition for Investigation Regarding the Reliability and Integrity of the Electric Grid in North Carolina* (“Petition”) filed in Docket No. E-100, Sub 173 on May 18, 2021 states that “All types of thermal generation experienced forced outages, including natural gas, coal, and nuclear plants, as well as utility scale onshore

wind.” Petition at 1. The Petition goes on to state that “the blades of wind turbines froze.” Petition at 3.

3. The Commission’s *Order Opening Investigation, Scheduling Technical Conferences, Requiring Responses, and Allowing Comments and Reply Comments* in the above-captioned docket further seeks to investigate the import capabilities of North Carolina’s investor-owned electric utilities. NCSEA has previously advocated for additional import capabilities. *See*, Docket Nos. E-100, Sub 157 and E-100, Sub 165.

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 Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

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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,



Peter H. Ledford
N.C. State Bar No. 42999
General Counsel
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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 2nd day of February 2022.


Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 2 day of February 2022.

[AFFIX SEAL OF NOTARY]


Notary Public


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

Daniel G. Brookshire
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 2nd day of February 2022.



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