

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1197  
DOCKET NO. E-7, SUB 1195**

<b>In the Matter of:</b> )	
<b>Application by Duke Energy Carolinas,</b> )	<b>NCSEA’S PETITION TO</b>
<b>LLC and Duke Energy Progress, LLC for</b> )	<b>INTERVENE</b>
<b>Approval of Proposed Electric</b> )	
<b>Transportation Pilot</b> )	

**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 dockets. 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 Carolinas, LLC and Duke Energy Progress, LLC. Similarly, many of NCSEA’s members are owners of electric vehicles.
3. NCSEA has previously been involved in issues involving electric vehicles before the Commission. *See generally, NCSEA’s Initial Comments on Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s Integrated Resource Plans, Docket No. E-100,*

Sub 157 (March 7, 2019); *NCSEA's Post-Hearing Brief*, Docket No. E-7, Sub 1146 (April 27, 2018); *Direct Testimony of Caroline Golin on Behalf of North Carolina Sustainable Energy Association*, Docket No. E-2, Sub 1142 (October 20, 2017); *NCSEA's Post-Hearing Brief*, Docket No. E-2, Sub 974 (October 27, 2010); *Direct Testimony of H. Lee Willis, P.E. on Behalf of the North Carolina Renewable Energy Association*, Docket No. E-100, Sub 112 (May 15, 2009).

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:

Peter H. Ledford  
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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,

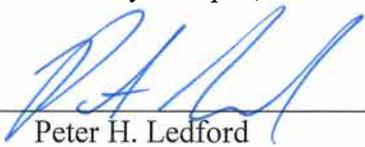


Peter H. Ledford  
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VERIFICATION

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 9th day of April, 2019.

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

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 9th day of April, 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 9th day of April, 2019.



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