

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-7, SUB 1276**

<b>In the Matter of: Duke Energy Carolinas, )</b>	
<b>LLC's Request to Initiate Technical )</b>	<b>NCSEA'S PETITION TO</b>
<b>Conference Pursuant to Commission Rule )</b>	<b>INTERVENE AND NOTICE</b>
<b>R1-17B(c) )</b>	<b>OF INTENT TO</b>
<b>)</b>	<b>PARTICIPATE</b>
<b>)</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 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 was actively involved in the development of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and requirements of the session law implemented in a manner consistent with legislative intent. NCSEA was also actively involved in Docket No. E-100, Sub 178 where the Commission adopted rules governing performance-based regulation.

3. NCSEA's members are not only customers of electric service providers, including Duke Energy Carolinas, LLC, they are also proponents of renewables-based generation and energy efficiency. As such, they have a strong interest in the rates and charges for electricity in this State.

4. NCSEA's interest in cases such as this one has been previously recognized by the Commission. See, e.g., Docket No. E-7, Sub 989 (NCSEA was permitted to intervene in Duke Energy Carolinas, LLC's 2011 general rate case); Docket No. E-2, Sub 1023 (Progress Energy Carolinas, Inc.'s 2012-13 general rate case); Docket No. E-7, Sub 1026 (Duke Energy Carolinas, LLC's 2013 general rate case); Docket No. E-22 Sub 532 (Dominion North Carolina Power's 2016 general rate case); Docket No. E-2, Sub 1142 (Duke Energy Progress, LLC's 2017 general rate case); Docket No. E-7, Sub 1146 (Duke Energy Carolinas, LLC's 2017 general rate case); Docket No. E-7, 1214 (Duke Energy Carolinas, LLC's 2019 general rate case); Docket No. E-2, Sub 1219 (Duke Energy Progress, LLC's 2019 general rate case); and Docket No. E-2, Sub 1300 (Duke Energy Progress, LLC's 2022 performance-based regulation rate case).

5. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

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

Taylor M. Jones  
Regulatory Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601  
taylor@energync.org

7. 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 and provides the Commission with notice of its intent to participate in the technical conference regarding Duke Energy Carolinas, LLC's projected transmission and distribution projects.

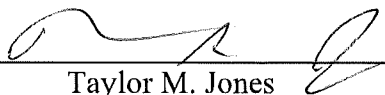
Respectfully submitted this the 18th day of October 2022.

/s/ Taylor M. Jones  
Taylor M. Jones  
Regulatory Counsel for NCSEA  
N.C. State Bar No. 58831  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601  
taylor@energync.org

VERIFICATION

Taylor M. Jones, first being duly sworn, deposes and says that she is the attorney for NCSEA; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of NCSEA.

This the 18th day of October 2022.

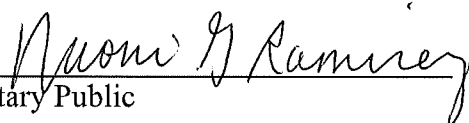
  
Taylor M. Jones

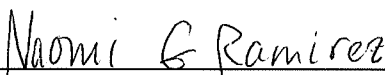
NORTH CAROLINA  
WAKE COUNTY

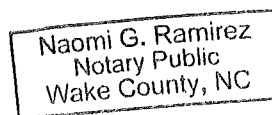
Sworn to and subscribed before me,

this the 18th day of October 2022.

[AFFIX SEAL OF NOTARY]

  
Notary Public

  
Printed Name of Notary Public  
My Commission Expires: 1/18/2026



**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 18th day of October 2022.

/s/ Taylor M. Jones  
Taylor M. Jones  
Regulatory Counsel for NCSEA  
N.C. State Bar No. 58831  
4800 Six Forks Road  
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Oct 18 2022