

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-22, SUB 551  
DOCKET NO. G-5, SUB 585**

<b>In the Matter of:</b>	)	
<b>Joint Application of Dominion Energy, Inc.,</b>	)	<b>NCSEA’S PETITION TO</b>
<b>and SCANA Corporation to Engage in a</b>	)	<b>INTERVENE</b>
<b>Business Combination Transaction</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’s members include citizens and advocates for renewable energy and energy efficiency, and business entities actively engaged in the development of an energy efficiency and renewable energy sector in the State of North Carolina. NCSEA represents generators of renewable energy, manufacturers of products and equipment used to produce and transmit renewable energy, entities that design and install renewable energy systems, and businesses that design, manufacture, and market energy efficiency systems and related

equipment. As consumers and providers of electric power and ancillary services, NCSEA's members have a strong interest in the configuration of the energy industry in North Carolina and the impact of any proposed combination transaction on rates, services, consumer data, and opportunities available to entities operating in the industry.

3. In Dockets E-22, sub 551 and G-5, sub 585, Dominion Energy, Inc. ("Dominion") and SCANA Corporation ("SCANA") propose to engage in a business combination whereby SCANA, the parent company of Public Service Company of North Carolina, Inc. ("PSNC Energy"), will become a wholly-owned subsidiary of Dominion pursuant to a merger agreement and plan of merger filed by SCANA and Dominion. SCANA is proposed to be the surviving legal entity.

4. The Commission's ruling in the pending dockets will have broad implications for NCSEA's members. The most immediate and obvious impact will be on NCSEA's members as consumers of electric power and natural gas. Additional impacts may involve changes in the approach to compliance with North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard, in particular compliance with the swine-waste set-aside. Furthermore, the merger of these companies could affect third-party access to consumer energy data, a topic on which NCSEA is actively engaged and has filed testimony related to in other dockets. Any of these possible outcomes will have a direct impact on NCSEA and its members.

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

Peter H. Ledford  
General Counsel  
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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.

Respectfully submitted,

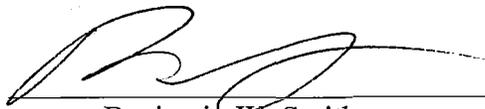


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**VERIFICATION**

Benjamin W. Smith, 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.

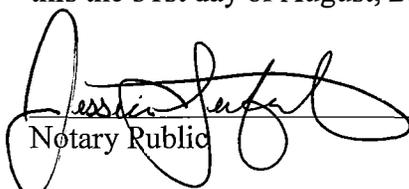
This the 31st day of August, 2018.

  
\_\_\_\_\_  
Benjamin W. Smith

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 31st day of August, 2018.

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



Jessica Seifert  
Printed Name of Notary Public  
My Commission Expires: 8-4-23

**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 31st day of August, 2018.



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