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GEORGE CAVROS
ATTORNEY AT LAW

FILED

AUG 06 2008

Clerk's Office
N.C. Utilities Commission

August 4, 2008

Ms. Renee Vance
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4925

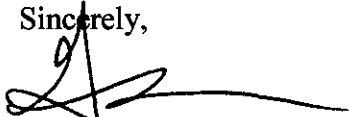
Re: DOCKET NUMBER E-7, SUB 856: In the Matter of Application of Duke Energy Carolinas, L.L.C. for Approval of a Solar Photovoltaic Distributed Generation Program and for Approval of Proposed Method of Recovery of Associated Costs

Dear Ms. Vance:

Please find enclosed the original and thirty one (31) copies of the Petition to Intervene of Southern Alliance for Clean Energy in the above referenced docket and the original and thirty one (31) copies of the Motion for Limited Admission to Practice by George Cavros on behalf of Southern Alliance for Clean Energy in the above reference docket.

Thank you for your assistance.

Sincerely,


George Cavros

Clerk's AS
AG
7Comm E x Dir
Bennink 3/3 Legal
Kirby 3/3 Autg
Watson 2/3 Elec
Hoover 3/3 Elec
Hilburn
Kite
Sessions
Ericson
Jones
Vance

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NUMBER E-7, SUB 856

FILED

In the Matter of)
)
Application of Duke Energy Carolinas,)
L.L.C. for Approval of a Solar)
Photovoltaic Distributed Generation)
Program and for Approval of)
Proposed Method of Recovery of)
Associated Costs)

AUG 06 2008

**Motion for Limited
Admission to Practice**

Clerk's Office
N.C. Utilities Commission

Pursuant to North Carolina General Statutes ("N.C.G.S.") §§ 62-60 and 84-4.1 and R1-22 of the North Carolina Utilities Commission's ("Commission") rules of Practice and Procedure, George Cavros, Esq. ("Mr. Cavros"), respectfully requests the Commission to enter admitting him to practice before the Commission for purpose of appearing on behalf of Southern Alliance for Clean Energy ("SACE") in the above captioned proceeding. In support of this Motion, Mr. Cavros alleges state the following:

1. Mr. Cavros is an attorney in good standing, licensed to practice law in the state of Florida, and will appear on behalf of SACE in the above captioned proceeding.

2. Mr. Cavros' full name, address and bar membership number is:

George S. Cavros
FL Bar No. 0022405
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
Tel: 954-563-0074
Fax: 954-565-8052
george@cavros-law.com

3. Mr. Cavros will continue to represent SACE in the above captioned proceeding until the final determination thereof, unless permitted to withdraw sooner by order of the commission.

4. Mr. Cavros has agreed to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the general court of Justice and the North Carolina State Bar in all respects as if he was a regularly admitted and licensed member of the Bar of North Carolina in good standing.

5. The state of Florida, where Mr. Cavros is regularly admitted to practice, grants permission to members in good standing of the North Carolina State Bar to appear before courts and regulatory commissions under circumstances similar to those authorized by N.C.G.S. § 84-4.1.

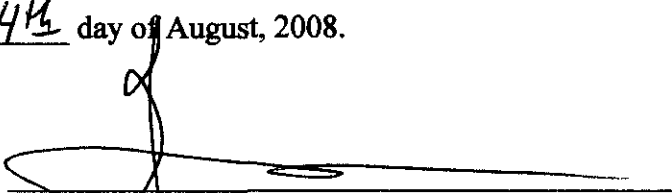
6. Mr. Cavros is associated for purposes of appearing before the Commission with Ms. Gudrun Thompson, N.C. State Bar No. 28829, Southern Environmental Law Center, 200 W. Franklin Street, Suite 330, Chapel Hill, NC 27516, a resident of North Carolina who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon which service may be had in all matters connected with the legal proceedings, or any disciplinary matter with the same effect as if personally made on Mr. Cavros.

7. Mr. Cavros has not been disciplined by any court or lawyer, regulatory organization nor has he had any pro hac vice admission revoked.

8. The statements required by N.C.G.S. § 84-4.1 are attached to this motion. Upon the Commission's issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support for the General Court of Justice and the North Carolina State Bar as required by N.C.G.S. § 84-4.1.

WHEREFORE, Mr. Cavros respectfully request the Commission to enter an order admitting him to practice before the Commission for the purpose of appearing on behalf of SACE in the above captioned proceeding.

Respectfully submitted, this 4th day of August, 2008.



George S. Cavros
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
Tel: 954-563-0074
Fax: 954-565-8052
george@cavros-law.com

Counsel for Southern Alliance for Clean Energy

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

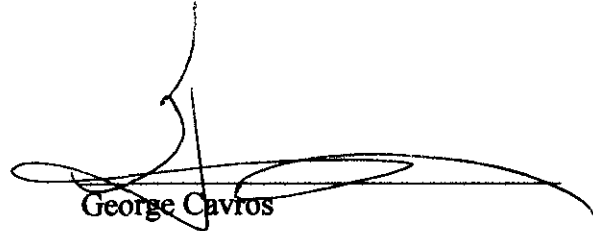
DOCKET NUMBER E-7, SUB 856

In the Matter of)	
)	
Application of Duke Energy Carolinas,)	Motion for Limited
L.L.C. for Approval of a Solar)	Admission to Practice
Photovoltaic Distributed Generation)	
Program and for Approval of)	
Proposed Method of Recovery of)	
Associated Costs)	

VERIFICATION

George Cavros, first being duly sworn, depose and say that I am an attorney representing the Southern Alliance for Clean Energy ("SACE"); that I have read the foregoing Motion for Limited Admission to Practice and that the statements in the motion are true to the best of my knowledge, and that any facts alleged up information and belief, I believe to be true.

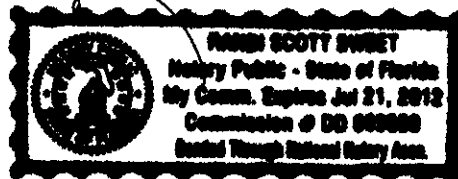
This 4 day of August 2008


George Cavros

Sworn to and subscribed before me,
This 4 day of August 2008

Notary Public


My Commission Expires



BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NUMBER E-7, SUB 856

In the Matter of)	
)	
Application of Duke Energy Carolinas,)	Statements Required by
L.L.C. for Approval of a Solar)	N.C.G.S. § 84-4.1
Photovoltaic Distributed Generation)	
Program and for Approval of)	
Proposed Method of Recovery of)	
Associated Costs)	

George Cavros hereby states:

1. I am an attorney regularly admitted to practice and in good standing in the state of Florida.

2 I am serving as counsel for Southern Alliance for Clean Energy ("SACE") and desire to represent SACE in the above captioned proceeding which is currently pending before the North Carolina Utilities Commission ("Commission").

3. My full name, address, and bar membership number is:

George S. Cavros
FL Bar No. 0022405
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
Tel: 954-563-0074
Fax: 954-565-8052
george@cavros-law.com

4. I will, unless permitted to withdraw sooner or by order of the Commission, continue to represent SACE in above captioned proceeding until the final determination.

5. I agree, with reference to all matters incident to Commission proceedings, to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the Commission, the General Court of Justice, and the North Carolina State

Bar in all respects as if I was a regularly admitted and licensed member of the Bar in North Carolina in good standing.

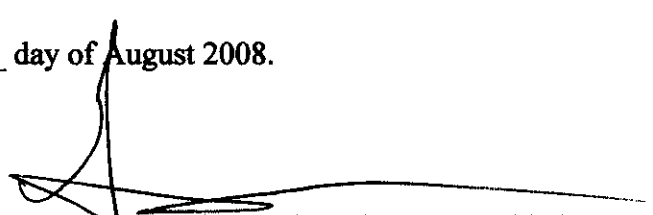
6. The state of Florida, where I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar in North Carolina.

7. I have associated, for purposes of appearing before the Commission, with Ms. Gudrun Thompson, N.C. State Bar No. 28829, Southern Environmental Law Center, 200 W. Franklin Street, Suite 330, Chapel Hill, NC 27516, a resident of North Carolina who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon which service may be had in all matters connected with the legal proceedings, or any disciplinary matter with the same effect as if personally made on me.

8. I have not been disciplined by any court or lawyer, regulatory organization nor have I had any pro hac vice admission revoked.

9. Upon the Commission's issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support for the General Court of Justice and the North Carolina State Bar as required by N.C.G.S. § 84-4.1.

Respectfully submitted, this 4th day of August 2008.



George S. Cavros
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
Tel: 954-563-0074
Fax: 954-565-8052
george@cavros-law.com

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NUMBER E-7, SUB 856

In the Matter of)	
)	
Application of Duke Energy Carolinas,)	Statements Required by
L.L.C. for Approval of a Solar)	N.C.G.S. § 84-4.1(2)
Photovoltaic Distributed Generation)	
Program and for Approval of)	
Proposed Method of Recovery of)	
Associated Costs)	

I, Ulla-Britt Reeves, hereby certify that I am the Regional Program director for Southern Alliance for Clean Energy ("SACE") with the principal address of SACE at P.O. Box, Knoxville, TN 37901-1842, and the North Carolina Office of SACE located at 29 North Market Street, Suite 409, Asheville, NC 28801, and that SACE has requested George Cavros, Esq. to represent it in the above captioned proceeding before the North Carolina Utilities Commission.

July 30, 2008




Ulla-Britt Reeves, Regional Program Director
29 North Market Street, Suite 409
Asheville, NC 28801
828-254-6776

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the Motion for Limited Admission to Practice was served on the parties or their counsel either by electronic mail or deposit in the US Mail, postage prepaid:

This 4th day of August 2008



George Cavros

Mr. Robert W. Kaylor Robert W. Kaylor, P.A. 3700 Glenwood Ave., Suite 330 Raleigh, NC 27603	Ms. Antoinette R. Wilkie Chief Counsel Public Staff-Legal Division 4326 Mail Service Center Raleigh, NC 27699-4326
Mr. Kodwo Ghartey-Tagoe VP Legal, State Regulation Ms. Lara Simmons Nichols Associate General Counsel Mr. Brian R. Franklin Senior Counsel Duke Energy Carolinas, LLC ECO3/P.O. Box 1006 Charlotte, NC 27201-1006	Mr. Leonard G. Green Assistant Attorney General N.C. Department of Justice P.O. Box 629 Raleigh, NC 27602-0629
Robert F. Page Crisp. Page, Currin, LLP 4010 Barrett Drive, Suite 205 Raleigh, NC 27609-6622	Daniel C. Higgins Burns, Day & Presnell, P.A. P.O. Box 10867 Raleigh, NC 27605

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FILED**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NUMBER E-7, SUB 856

AUG 06 2008

Clerk's Office
N.C. Utilities Commission

In the Matter of)	
)	
Application of Duke Energy Carolinas,)	Petition by Southern Alliance
L.L.C. for Approval of a Solar)	for Clean Energy to Intervene
Photovoltaic Distributed Generation)	
Program and for Approval of)	
Proposed Method of Recovery of)	
Associated Costs)	

Southern Alliance for Clean energy (SACE"), by and through its counsel hereby petitions the North Carolina Utilities Commission ("Commission"), pursuant to Rule R1-19 of the Rules of the Commission, for leave to intervene in the above-captioned proceeding. In support of this Petition, SACE states as follows:

1. SACE is a nonprofit corporation organized under the laws of the State of Tennessee. The principal address of SACE is P.O. Box, Knoxville, TN 37901-1842. The North Carolina Office of SACE is located at 29 North Market Street, Suite 409, Asheville, NC 28801.

2. The attorney for SACE to whom all correspondence and filings should be addressed is:

George Cavros, Esq.
120 E. Oakland Park Boulevard, Suite 105
Fort Lauderdale, FL 33334
954-563.0074
954-565-8052 (fax)
george@cavros-law.com

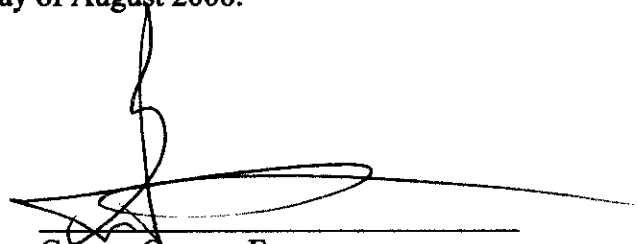
3. Pursuant to Rule R1-39, SACE agrees to accept electronic service to the email address of its attorney as shown above.

4. The mission of SACE is to promote responsible energy choices that solve global warming problems and ensure clean, safe healthy communities throughout the Southeast. SACE has previously participated before the Commission to advocate for energy plans, policies and systems that best serve the environmental and economic interests of its members in the Southeast. SACE has been involved in integrated resource planning before the Commission related to the 2005 and 2006 plans; was permitted to intervene in Docket No. E-7, Sub 790, regarding Duke Energy Carolinas, LLC (“Duke”) application for a Certificate of Public Convenience and Necessity for the proposed new coal-fired units at the Cliffside site; was permitted to intervene in Docket No. E-100, Sub 110, regarding the potential for energy efficiency resources to meet the demand for electricity in North Carolina; and has been granted intervention in Docket No. E-7, Sub 831, concerning Duke’s application for approval of the Save-a-Watt approach. SACE is also represented as an ex officio member on the North Carolina Legislative Commission on Global Climate Change.

5. SACE has members in North Carolina and in Duke’s service area who use electricity and who are affected by economic and environmental impacts directly associated with new generation systems. Members of SACE would be directly and substantially impacted by decisions of the Commission regarding Duke’s solar photovoltaic distributed generation program.

6. WHEREFORE, SACE respectfully requests that the Commission enter an order permitting SACE to intervene and fully participate in this matter, without limitation, and exercise all rights accorded this status under North Carolina law.

Respectfully submitted, this 4th day of August 2008.

A handwritten signature in black ink, appearing to be 'George Cavros', written over a horizontal line.

George Cavros, Esq.
120 E. Oakland Park Boulevard, Suite 105
Fort Lauderdale, FL 33334
954-563.0074
954-565-8052 (fax)
george@cavros-law.com

STATE OF NORTH CAROLINA)
)
COUNTY OF BUNCOME)

VERIFICATION

I, Ulla-Britt Reeves, being duly sworn do attest and affirm that I am the Regional Program Director of Southern Alliance for Clean Energy, that I have read the foregoing Petition of Southern Alliance of Clean Energy for Leave to Intervene in the above captioned proceeding, that the statements in the Petition are true to the best of my knowledge, and that any facts alleged upon information and belief, I believe to be true.

This 30 day of July, 2008


Ulla-Britt Reeves

Sworn to and subscribed before me,
This 30th day of July, 2008

Notary Public




My Commission Expires 11-30-2008



CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the Southern Alliance for Clean Energy Petition for Leave to Intervene was served on the parties or their counsel either by electronic mail or deposit in the US Mail, postage prepaid:

This 4th day of August 2008



George Cavros

Mr. Robert W. Kaylor Robert W. Kaylor, P.A. 3700 Glenwood Ave., Suite 330 Raleigh, NC 27603	Ms. Antoinette R. Wilkie Chief Counsel Public Staff-Legal Division 4326 Mail Service Center Raleigh, NC 27699-4326
Mr. Kodwo Ghartey-Tagoe VP Legal, State Regulation Ms. Lara Simmons Nichols Associate General Counsel Mr. Brian R. Franklin Senior Counsel Duke Energy Carolinas, LLC ECO3/P.O. Box 1006 Charlotte, NC 27201-1006	Mr. Leonard G. Green Assistant Attorney General N.C. Department of Justice P.O. Box 629 Raleigh, NC 27602-0629
Robert F. Page Crisp. Page, Currin, LLP 4010 Barrett Drive, Suite 205 Raleigh, NC 27609-6622	Daniel C. Higgins Burns, Day & Presnell, P.A. P.O. Box 10867 Raleigh, NC 27605