

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 180

In the Matter of:)	PETITION TO INTERVENE BY
Investigation of Proposed Net)	VOTE SOLAR AND SOUTHERN
Metering Policy Changes)	ALLIANCE FOR CLEAN ENERGY

PURSUANT TO North Carolina Utilities Commission (“Commission”) Rule R1-19, Vote Solar and the Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), through counsel, file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. Vote Solar is an independent 501(c)(3) nonprofit organization working to repower the United States with clean energy by making solar power more accessible and affordable through effective policy advocacy. Vote Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to large utility-scale solar facilities, and to encourage common-sense electrification of the economy, all as part of the transition away from fossil fuel-powered energy consumption. Vote Solar is not a trade group, and it does not have corporate members. Established in 2002, Vote Solar has over 80,000 members nationally, including members located within the service territory of Duke Energy Progress, LLC (“DEP”), and Duke Energy Carolinas, LLC (“DEC”). Vote Solar has its principal office in California, with a mailing address of 360 22nd Street, #730, Oakland, California 94612.

2. Vote Solar's regulatory focus has included rate design and public policy issues related to consumer use of and access to distributed solar generation. Vote Solar has participated in utility commission proceedings across the country involving net metering, interconnection, integrated distribution planning, rate design, general rate case applications, and integrated resource planning. Vote Solar has appeared and presented expert testimony before utility commissions across the country, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, South Carolina, Utah, Vermont, and Wisconsin. Vote Solar advocates against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize distributed solar generation to effectively manage electricity costs. Vote Solar is already a party in Docket Nos. E-7, Sub 1214 and E-2, Sub 1219 in which Duke initially filed its Joint Applications for Approval of Revised Net Metering Tariffs (NEM Tariff Applications).

3. Vote Solar and its members have a direct and substantial interest in these proceedings. Vote Solar is a signatory to the Memorandum of Understanding that was attached to Duke's Application. Vote Solar supports net energy metering tariffs that will provide customers and its members with improved access to rooftop solar and additional ways to reduce their energy consumption. More generally, Vote Solar seeks to promote innovative tariffs, as well as energy efficiency and demand side management programs, that reduce reliance on fossil fuels and support the expansion of renewable energy in North Carolina. Vote

Solar's involvement in this docket supports clean energy decisions that will lead to cleaner, safer, and healthier communities for all North Carolinians.

4. Southern Alliance for Clean Energy ("SACE") is a regional nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members, including members in North Carolina who receive electricity service from utilities regulated by the Commission, are interested in promoting greater reliance on clean energy resources to meet the Southeast's energy needs. SACE works directly with diverse stakeholders and industries on energy issues affecting the region. SACE also promotes clean energy solutions such as energy efficiency, solar energy and transport electrification through education and outreach in order to improve public health, the environment and the economy. SACE is already an intervenor in Docket Nos. E-7, Sub 1214 and E-2, Sub 1219 in which Duke initially filed its Joint Applications for Approval of Revised Net Metering Tariffs (NEM Tariff Applications). SACE has its principal office in Tennessee, with a North Carolina address of 46 Orchard Street, Asheville, NC 28801.

5. SACE and its members have a direct and substantial interest in these proceedings. SACE is a signatory to the Memorandum of Understanding that was attached to Duke's Application. SACE has a long history of working to promote net energy metering and fair rate designs that take into account the needs of low-income customers. Its members include customers of Duke. SACE seeks to intervene in this proceeding in order to ensure that rooftop solar options are within

reach for a broader range of households, including for SACE's members, and that our electric public utilities properly value the benefits of rooftop solar for the utility system as a whole. SACE has previously intervened in numerous proceedings before the Commission on behalf of its North Carolina members.

6. The attorney for Vote Solar and SACE to whom all correspondence and filings in this docket should be addressed is:

David Neal
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to dneal@selcnc.org.

WHEREFORE, Vote Solar and SACE request that they be allowed to intervene in this docket.

Respectfully submitted this the 25th day of January, 2022.

/s/ David L. Neal

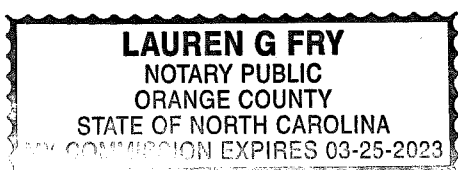
David L. Neal
N.C. Bar No. 27992
dneal@selcnc.org

Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421

*Attorney for Vote Solar and Southern Alliance
for Clean Energy*

VERIFICATION

I, David L. Neal, verify that the contents of the foregoing Petition to Intervene are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of Vote Solar and Southern Alliance for Clean Energy.



A handwritten signature of David L. Neal in cursive script, written over a horizontal line.

David L. Neal

Date: January 25, 2022

Orange County, North Carolina

Sworn to and subscribed before me this day by David L. Neal.

This 25 day of January, 2022.

A handwritten signature of Lauren G. Fry in cursive script, written over a horizontal line.

Signature

Lauren G. Fry, Notary Public

My commission expires: 3/25/2023

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene by Vote Solar and Southern Alliance for Clean Energy as filed today in Docket No. E-100, Sub 180, has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 25th day of January, 2022.

/s/ David L. Neal

David L. Neal