

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, Sub 1315
DOCKET NO. E-7, Sub 1288**

In the Matter of:)
Consideration of Duke Energy Carolinas,) **NCSEA’S PETITION TO**
LLC’s and Duke Energy Progress, LLC’s) **INTERVENE**
Petition For Approval of Clean Energy)
Impact Program)
)
)

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. Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” collectively “Duke Energy”) filed a *Joint Petition for Approval of Clean Energy Impact Program* on Jan. 27, 2023. This filing was made pursuant to Section 5 of Session Law 2021-165 (“HB 951”) and is meant to replace the Renewable Advantage Program that was adopted in Docket Nos. E-2, Sub 1190, E-7, Sub 1185, and E-100, Sub 90.

3. NCSEA was allowed to intervene and actively participated in the Renewable Advantage Program, Docket Nos. E-2, Sub 1190, E-7, Sub 1185, and E-100, Sub 90.

4. NCSEA was actively involved in the negotiations that led to HB 951. NCSEA's membership includes developers of solar energy facilities that would be eligible to supply energy under the provisions of HB 951 and Duke Energy's present proposal. Further, NCSEA's membership includes residential and small business customers that would be eligible to receive service pursuant to Duke Energy's present proposal. The interests of NCSEA's members are not represented by any other party to the proceeding. As such, NCSEA has an interest in ensuring that the statute is implemented in accordance with the intent of the legislature.

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:

Taylor Jones
Counsel for NCSEA
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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.

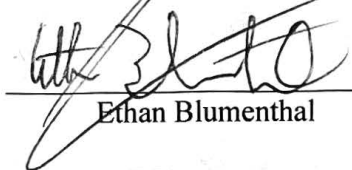
Respectfully submitted,

/s/ Ethan Blumenthal
Ethan Blumenthal
N.C. State Bar No. 53388
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VERIFICATION

Ethan Blumenthal, 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 6th day of February, 2023.



Ethan Blumenthal

NORTH CAROLINA
MECKLENBURG COUNTY

Sworn to and subscribed before me,

this the 6th day of February, 2023.

[AFFIX SEAL OF NOTARY]



Notary Public



Victoria M. Brown
Printed Name of Notary Public
My Commission Expires: October 3, 2027

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 6th day of February, 2023.

/s/ Ethan Blumenthal

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