

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, Sub 1314  
DOCKET NO. E-7, Sub 1289**

<b>In the Matter of:</b>	)	
<b>Consideration of Duke Energy Carolinas,</b>	)	<b>NCSEA’S PETITION TO</b>
<b>LLC’s and Duke Energy Progress, LLC’s</b>	)	<b>INTERVENE</b>
<b>Petition Requesting Approval of Green</b>	)	
<b>Source Advantage Choice Program and</b>	)	
<b>Rider GSAC</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. Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” collectively “Duke Energy”) filed a *Joint Petition for Approval of Green Source Advantage Choice 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 current Green Source Advantage

Program (“GSA”) and GSA Bridge Program that were adopted in Docket Nos. E-2, Sub 1170, and E-7, Sub 1169 and E-2, Sub 1306, and E-7, Sub 1277, respectively.

3. NCSEA was allowed to intervene and actively participated in both the GSA Program and GSA Bridge Program, Docket Nos. E-2, Sub 1170, and E-7, Sub 1169 and E-2, Sub 1306, and E-7, Sub 1277, respectively.

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 large nonresidential 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  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601  
taylor@energync.org

Ethan Blumenthal  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601  
ethan@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.


Respectfully submitted,

/s/ Ethan Blumenthal  
Ethan Blumenthal  
N.C. State Bar No. 53388  
Regulatory Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(704) 618-7282  
ethan@energync.org

**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 6<sup>th</sup> day of February, 2023.

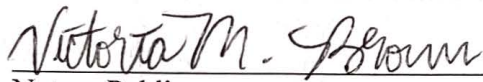
  
\_\_\_\_\_  
Ethan Blumenthal

NORTH CAROLINA  
MECKLENBURG COUNTY

Sworn to and subscribed before me,

this the 6<sup>th</sup> day of February, 2023.

[AFFIX SEAL OF NOTARY]

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

**VICTORIA M BROWN**  
Notary Public  
Mecklenburg Co., North Carolina  
My Commission Expires Oct. 3, 2027

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 6<sup>th</sup> day of February, 2023.

/s/ Ethan Blumenthal

Ethan Blumenthal  
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Regulatory Counsel  
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