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FILED

SEP 24 2008

Clerk's Office
N.C. Utilities Commission

OFFICIAL COPY

VIA HAND DELIVERY

September 24, 2008

Ms. Renne C. Vance
Chief Clerk
The NC Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

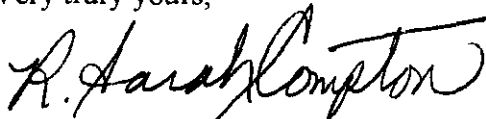
Re: Motion to Intervene in Docket No. E-7, Sub. 856

Dear Ms. Vance:

Enclosed please find the original and 30 copies of The Solar Alliance's Motion to Intervene in Docket No. E-7, Sub. 856. All filings, correspondence and communications on or related to this docket should be sent to R. Sarah Compton, Esq. at the above-referenced address, with copies to Carrie Hitt, President, The Solar Alliance, P.O. Box 534, North Scituate, MA 02060. I have served the enclosed Motion on all parties to this proceeding.

Thank you for your assistance with this filing.

Very truly yours,



R. Sarah Compton, Esq.

Counsel for The Solar Alliance

mtl
Full Dist.

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA
DOCKET NO. E-7, SUB 856**

FILED

SEP 24 2008

**In the matter of Application of Duke)
Energy Carolinas, LLC for Approval)
of a Solar Photovoltaic Distributed)
Generation Program and for Approval)
of the Proposed Method of Recovery)
of Associated Costs)**

Clerk's Office
N.C. Utilities Commission

MOTION TO INTERVENE

The Solar Alliance, through counsel and pursuant to Rules R1-7 and R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), respectfully requests the Commission to enter an order permitting The Solar Alliance to intervene and participate in the above-captioned docket filed with the Commission on June 6, 2008 by the Due Energy Carolinas, LLC ("Duke"). In support of this Motion to Intervene, The Solar Alliance states as follows:

1. The Solar Alliance is a not-for profit 501 (c) (6) membership organization incorporated in the District of Columbia. The Solar Alliance's business mailing address is PO Box 534, North Scituate, Massachusetts, 02060.
2. Members of the Solar Alliance include American Solar Electric, Applied Materials, Borrego Solar, BP Solar, Conergy, Dow-Corning, Energy Innovations, Evergreen Solar, First Solar, Kyocera, Mainstream Energy, Mitsubishi Electric, MMA Renewable Ventures, Oerlikon Solar, Iberdrola Renewables, Sanyo, Schott Solar, Sharp Solar, SolarCity, Solaria, Solar Power Partners, SolarWorld, SPG Solar, SunEdison, SunPower, Suntech, Tioga Solar, Trinity Solar, Uni-Solar and Xantrex.

3. The Solar Alliance is a state-focused association of the world's leading solar photovoltaic ("PV") manufacturers, integrators, installers and financiers dedicated to accelerating the deployment of solar electric power in the United States, including in North Carolina. The Solar Alliance and its members have a strong interest in the adoption and implementation of policies and programs that will accelerate the movement toward a low-carbon economy and stimulate the development and use of zero-carbon, renewable energy technologies such as solar PV. To that end, The Solar Alliance seeks to help legislators, regulators and utilities make the transition to solar power by providing technical and policy expertise that is in the best interest of residential, commercial and government customers and Americans as a whole. The Solar Alliance works closely with state and local solar advocates, seeking to form coalitions with corporate, grass roots, and academic institutions, as well as with local governments that advocate solar energy, so that the solar community may speak with a unified and stronger voice.
4. At least one Solar Alliance member, Sun Edison, has an ongoing solar PV project in North Carolina. On information and belief, other members sell solar energy component parts to various parties in the State.
5. As providers of solar PV systems, related financing and services, The Solar Alliance has an interest in this proceeding. The proposal requested herein, if adopted in whole or in part, will impact the solar PV market in North Carolina.

6. Intervention by The Solar Alliance will not prejudice any other party or unduly delay this proceeding.
7. The Solar Alliance requests that all communications and filings related to this docket be sent to the following:

R. Sarah Compton, Esq.
P.O. Box 12728
Raleigh, NC 27607
(919) 812-4977
rscompton@nc.rr.com

Counsel for The Solar Alliance

Carrie Cullen Hitt
President
The Solar Alliance
P.O.Box 534
North Scituate, MA 02060
617 688 9417
carrie@solaralliance.org

8. The Solar Alliance has an interest in the above referenced matter and should be allowed to intervene and actively participate in the proceeding.
9. Pursuant to Rule R1-29, The Solar Alliance agrees to electronic service of all pleadings and other papers in these dockets.

THEREFORE, The Solar Alliance, requests that the Commission issue an order granting its Motion to Intervene as a full party of record and allow it to fully participate in this matter including, without limitation, filing and presenting testimony, cross examination of witnesses, participation in all

formal and informal conferences and hearings, and filings and briefs and any other pleading, to the extent it deems necessary for its full participation herein.

Respectfully submitted, this 24th day of September, 2008.

A handwritten signature in cursive script, reading "R. Sarah Compton".


R. Sarah Compton, Esq.
P.O. Box 12728
Raleigh, NC 27605
NC State Bar #22642
(919) 812-4977

Counsel for The Solar Alliance

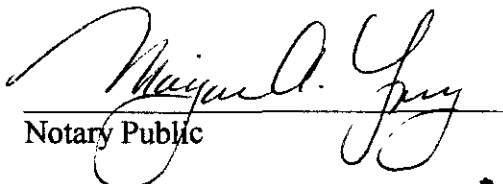
VERIFICATION

**COMMONWEALTH OF MASSACHUSETTS
COUNTY OF PLYMOUTH**

I, Carrie Hitt, President of Solar Alliance, verify that the facts set forth in the foregoing Motion 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.


Carrie Hitt, President, Solar Alliance
Date signed: September 23, 2008

Sworn to and subscribed before me,
This the 23 day of September, 2008.


Notary Public

My commission expires: _____



MARJORIE A. YOUNG
Notary Public
Commonwealth of Massachusetts
My Commission Expires April 20, 2012

CERTIFICATE OF SERVICE

I hereby certify that the following persons on the docket service list for Docket No. E-7, Sub. 856 have been served true and accurate copies of the foregoing Motion to Intervene by first class mail, postage pre-paid:

Mr. Robert W. Kaylor
Robert W. Kaylor, P.A.
3700 Glenwood Ave., Suite 330
Raleigh, NC 27603

Mr. Leonard G. Green
Assistant Attorney General
NC Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629

Daniel C. Higgins
Burns, Day & Presnell, P.A.
P.O. Box 10867
Raleigh, NC 27605

Mr. Brian R. Franklin
Senior Counsel
Duke Energy Carolinas, LLC
ECO3/P.O. Box 1006
Charlotte, NC 27201-1006

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1708 Trawick Road
Raleigh, NC 27604

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Raleigh, NC 27609-6622

Mr. Kodwo Ghartey-Tagoe
VP Legal, State Regulation
Duke Energy Carolinas, LLC
ECO3/P.O. Box 1006
Charlotte, NC 27201-1006

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Associate General Counsel
Duke Energy Carolinas, LLC
ECO3/P.O. Box 1006
Charlotte, NC 27201-1006

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Staff Counsel, NCSEA
P.O. Box 6465
Raleigh, NC 27628

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Energy Strategies, LLC
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Salt Lake City, UT 84111

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Attorney at Law
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120 E. Oakland Park Boulevard
Fort Lauderdale, FL 33334

Corporate Energy Manager
The Kroger Company
1014 Vine Street
Cincinnati, OH 45202

Antoinette R. Wike
Chief Counsel, Public Staff
NC Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699-4326

This the 24th day of September, 2008

A handwritten signature in black ink, reading "R. Sarah Compton". The signature is fluid and cursive, with a large, stylized "C" at the end.

R. Sarah Compton, Esq.
Bar No. 22642
P.O. Box 12728
Raleigh, NC 27605
(919) 812-4977