

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-7, SUB 1261

In the Matter of: )  
Duke Energy Carolinas, LLC’s Application ) NCSEA’S PETITION TO  
for Approval of Smart Saver Solar Energy ) INTERVENE  
Efficiency 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. On November 29, 2021, Duke Energy Progress, LLC (“DEC”) filed its Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance with G.S. § 62-126.4 and House Bill 951 in Docket Nos. E-7, Sub 1214, E-2, Sub 1219, and E-2, Sub 1076 which included as an attachment a Memorandum of Understanding, which included NCSEA as a signatory, that, among other issues, addressed the matters at issue in the above-captioned docket.

3. NCSEA was an active participant in Docket Nos. E-2, Sub 1167 and E-7, Sub 1166 which implemented the rooftop solar rebate provision of S.L. 2017-192, as codified in N.C. Gen. Stat. § 62-155(f).

4. NCSEA was also an active participant in the in the DSM/EE Collaborative, which developed the framework for the new energy efficiency program proposed in the above-captioned docket.

5. NCSEA's membership includes residential rooftop solar installers, adopters, and potential adopters who work or live in DEC's service territory

6. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

7. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

Benjamin W. Smith  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 111  
ben@energync.org

5. 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,



---

Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

VERIFICATION

Peter H. Ledford, 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.

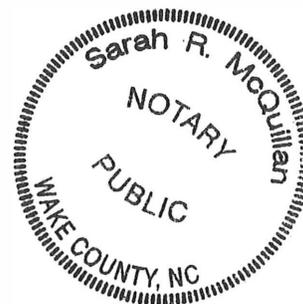
This the 20<sup>th</sup> day of December, 2021.

Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 20<sup>th</sup> day of December, 2021.



[AFFIX SEAL OF NOTARY]

Notary Public

Sarah R. McQuillan

Printed Name of Notary Public

My Commission Expires: 5/30/2026

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 20th day of December, 2021.

  
\_\_\_\_\_  
Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org