

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1264

In the Matter of:)
Application of Duke Energy)
Carolinas, LLC for Approval of)
Renewable Energy and Energy)
Efficiency Portfolio Standard)
(REPS) Compliance Report and)
Cost Recovery Rider Pursuant to)
N.C. Gen. Stat. § 62-133.8 and)
Commission Rule R8-67)

PETITION OF NCSEA TO
INTERVENE

PETITION OF NCSEA 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. NCSEA has frequently appeared before this Commission as an intervenor, including in dockets concerning Duke Energy Carolina, LLC’s (“DEC”) application for cost recovery under North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS law”). *See, e.g.*, Commission Docket No. E-7, Sub 1246; Commission Docket No. E-7, Sub 1229; Commission Docket No. E-7, Sub 1191; Commission Docket

No. E-7, Sub 1162; Commission Docket No. E-7, Sub 1131; Commission Docket No. E-7, Sub 1106; Commission Docket No. E-7, Sub 1074; Commission Docket No. E-7, Sub 1052; Commission Docket No. E-7, Sub 1034; Commission Docket No. E-7, Sub 1008; Commission Docket No. E-7, Sub 984; Commission Docket No. E-7, Sub 936; Commission Docket No. E-7, Sub 872.

3. The Commission's ruling in this docket will have broad implications for both NCSEA and its members. NCSEA was a chief proponent of the REPS law and has a direct and substantial interest in its implementation to assure that the policies and goals of the REPS law are achieved in a manner consistent with the legislative intent. Additionally, some of NCSEA's members participate in utility efficiency programs, generate renewable energy certificates used by DEC and others to meet their obligations under the REPS law, and/or complete energy efficiency projects eligible for REPS compliance; as such, these members have an interest in the REPS compliance efforts of electric power suppliers.

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

5. 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
General Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

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

6. 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/ Peter H. Ledford
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 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 10th day of March, 2022.



Peter Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 10th day of March, 2022.

[AFFIX SEAL OF NOTARY]

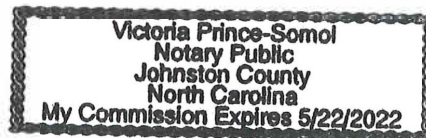


Notary Public

Victoria Prince Somol

Printed Name of Notary Public

My Commission Expires: 5-22-2022



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 10th day of March, 2022.

 /s/ Peter H. Ledford
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