

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1164

In the Matter of:)	
Application of Duke Energy Carolinas,)	
LLC for Approval of Demand-Side)	
Management and Energy Efficiency)	PETITION TO INTERVENE
Cost Recovery Rider Pursuant to N.C.)	
Gen. Stat. § 62-133.9 and Commission)	
Rule R8-69)	

PURSUANT TO Commission Rule R1-19, the Natural Resources Defense Council (“NRDC”), through counsel, files this petition to intervene in the above-captioned docket along with co-intervenors the North Carolina Justice Center (“NC Justice Center”) and the Southern Alliance for Clean Energy (“SACE”), and provides the following information in support of its petition:

1. N.C. Gen. Stat. § 62-133.9(d) authorizes the Commission to approve an annual rider to the rates of an electric public utility to recover all reasonable and prudent costs of new demand-side management (“DSM”) and energy efficiency (“EE”), as well as incentives. On March 7, 2018, Duke Energy Carolinas, LLC (“DEC”) filed an application for approval of its DSM and EE cost-recovery and incentive rider for 2019 (“Rider 10”). Commission Rule R8-69(b) provides that each year, the Commission will conduct a proceeding for each electric utility to establish an annual DSM/EE rider. This is the annual proceeding under N.C.G S. § 62-133.9(d) and Commission Rule R8-69(b).

2. The Natural Resources Defense Council is a national environmental organization with more than 30 years of experience working on state energy-policy issues, including utility regulation, energy efficiency, and renewable energy. NRDC conducts advocacy, outreach, and education on the issue of smart rate design, and

encourages models that will promote efficient, equitable, and affordable electric systems. NRDC also works to promote affordable energy for low-income households, and conducts research, partners with manufacturers, and advocates for policies that create energy savings through energy-efficiency programs. In 2013, NRDC helped launch the Energy Efficiency for All project, a national partnership that strives toward increasing energy efficiency in the affordable multifamily housing sector. NRDC has headquarters at 40 West 20th Street, New York, New York 10011, and also has staff in North Carolina.

3. NRDC and the consumers whose interests it represents have a direct and substantial interest in this proceeding. Many of the consumers represented by NRDC are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. Further, NRDC and its members have an interest in promoting increased investment in energy efficiency, demand-side management programs, and other least-cost measures. NRDC and its members have a particular interest in promoting increased investments in programs that bring the direct benefits of energy-efficiency measures to residents of affordable, multifamily buildings.

4. NRDC has previously intervened in proceedings before the Commission.

5. On May 2, 2018, the Commission entered an Order Granting the Petition to Intervene of the NC Justice Center and SACE under the representation of the Southern Environmental Law Center in this docket. The NC Justice Center and SACE consent to adding NRDC as a co-intervenor.

6. The attorney for the NRDC to whom all correspondence and filings in this docket should be addressed is:

David Neal
Southern Environmental Law Center

601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to dneal@selcnc.org.

WHEREFORE, NRDC requests that it be allowed to intervene in this docket.

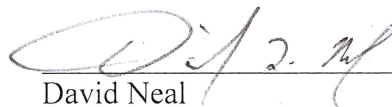
Respectfully submitted this the 21st day of May, 2018.

s/ David Neal
N.C. Bar No. 27992
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
Telephone: (919) 967-1450
Fax: (919) 929-9421
dneal@selcnc.org

*Attorney for Natural Resources Defense Council, North
Carolina Justice Center, and Southern Alliance for Clean
Energy*

VERIFICATION

I, David Neal, verify that the contents of the foregoing Petition 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. I am authorized to sign this verification on behalf of Natural Resources Defense Council, North Carolina Justice Center, and Southern Alliance for Clean Energy.

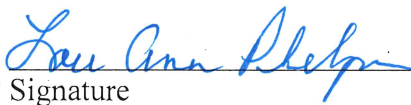

David Neal

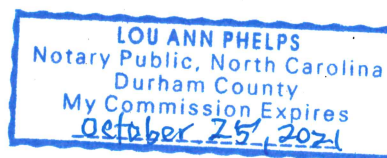
Date: 5/21/2018

Orange County, North Carolina

Sworn to and subscribed before me this day by David Neal.

This the 21st day of May, 2018.


Signature



Lou Ann Phelps, Notary Public

My commission expires: October 25, 2021

CERTIFICATE OF SERVICE

I certify that the persons on the service list have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 21st day of May, 2018.

s/ Robin G. Dunn
Robin G. Dunn