BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-7, SUB 1185

In the Matter of:	
Request of Duke Energy Carolinas, LLC)	NCSEA'S PETITION TO
for Approval of Renewable Advantage)	INTERVENE
Rider (NC)	

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. NCSEA is a statewide leader and active stakeholder in discussions regarding the value of renewable energy in North Carolina and how such value can be properly dispersed among rate payers, utilities, and all other parties involved in the North Carolina energy market. Furthermore, many of NCSEA's members are customers of Duke Energy Carolinas, LLC ("DEC").
- 3. NCSEA has been a party to Docket No. E-100, Sub 90 (the "NC GreenPower Docket") since 2001. The NC GreenPower Docket is a companion docket to the DEC rider

proposal and directly deals with the NC GreenPower proposal at issue in the above-captioned proceeding. NCSEA has been an active participant in the NC GreenPower proceeding, including regulatory and implementation phases, for more than 17 years. Many of NCSEA's members are participants in the NC GreenPower programs offered through DEC.

- 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 Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford General Counsel for NCSEA 4800 Six Forks Road Suite 300 Raleigh, NC 27609 (919) 832-7601 Ext. 107 peter@energync.org Benjamin W. Smith Regulatory Counsel for 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 this the 3rd day of December, 2018

Benjamin W. Smith

Regulatory Counsel for NCSEA

N.C. State Bar No. 48344

4800 Six Forks Road

Suite 300

Raleigh, NC 27609

(919) 832-7601 Ext. 111

ben@energync.org

VERIFICATION

Benjamin W. Smith, 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 3rd day of December, 2018.

Benjamin W. Smith

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me,

this the 3 day of December, 2018.

[AFFIX SEAL OF NOTARY]

Daniel G Brookshire, Notary Public **Orange County, North Carolina** My Commission Expires 7/2/2022

Printed Name of Notary Public

My Commission Expires:

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 3rd day of December, 2018.

Benjamin W. Smith

Regulatory Counsel for NCSEA

N.C. State Bar No. 48344

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