

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, Sub 1317  
DOCKET NO. E-7, Sub 1290**

**In the Matter of:** )  
**Consideration of Duke Energy Carolinas,** ) **NCSEA’S PETITION TO**  
**LLC’s and Duke Energy Progress, LLC’s** ) **INTERVENE**  
**2023 Solar Procurement Pursuant to Initial** )  
**Carbon Plan** )  
)

**NCSEA’S PETITION TO INTERVENE**

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, as well as the Commission’s Feb. 1, 2022, *Order Initiating Proceeding and Requesting Comments* (“Initiating Order”), 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 December 30, 2022, the Commission issued the *Order Adopting Initial Carbon Plan and Providing Direction for Future Planning* (“Carbon Plan Order”) requiring Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” collectively “Duke Energy”) to target 2,350 MW of new solar as well as 600 MW of Solar Plus Storage.

Pursuant to this Order, Duke Energy filed a *Motion to Open New 2023-2024 Solar Procurement Program Dockets, Grant Flexibility to Administer Future Solar RFPs through Resource Solicitation Clusters, and for Extension of Time to Allow Further Stakeholder Engagement* on Jan. 27, 2023. On Feb 1, 2023, the Commission issued its Initiating Order.

3. NCSEA was actively involved in the negotiations that led to House Bill 951 and Session Law 2021-165, which directed the Commission to develop a Carbon Plan and issue the Carbon Plan Order and made alterations to G.S. §62-110.8, competitive procurement of renewable energy. NCSEA was allowed to intervene in Docket no. E-100, Sub 179 and was actively involved in the Commission's development of an initial Carbon Plan. NCSEA also intervened and actively participated in Docket nos. E-2, Sub 1297 and E-7, Sub 1268 pertaining to the initial procurement of solar energy pursuant to the Carbon Plan Order. NCSEA's membership includes developers of solar energy facilities that would be eligible to supply energy under the provisions of HB 951 and Duke Energy's present proposal.

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

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

Taylor Jones  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
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7. 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.

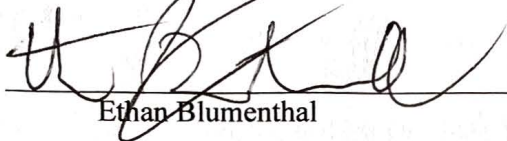
Respectfully submitted,

/s/ Ethan Blumenthal  
Ethan Blumenthal  
N.C. State Bar No. 53388  
Regulatory Counsel  
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4800 Six Forks Road  
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(704) 618-7282  
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**VERIFICATION**

Ethan Blumenthal, 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 6<sup>th</sup> day of February, 2023.


  
Ethan Blumenthal

NORTH CAROLINA  
MECKLENBURG COUNTY

Sworn to and subscribed before me,

this the 6<sup>th</sup> day of February, 2023.

[AFFIX SEAL OF NOTARY]

  
Notary Public



Victoria M. Brown  
Printed Name of Notary Public  
My Commission Expires: October 3, 2027

**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 6<sup>th</sup> day of February, 2023.

/s/ Ethan Blumenthal

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