

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1307**

In the Matter of:)
Application by Duke Energy Progress, LLC) NCSEA’S PETITION TO
for Approval of Multi-Family New) INTERVENE
Construction Tariffed On-Bill Pilot

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 September 30, 2022, Duke Energy Progress, LLC (“DEP”) filed its Proposed Multi-Family New Construction Tariffed On-Bill Pilot in the above-captioned docket and in compliance with the Stipulation of Settlement by and among DEP, NCSEA, the North Carolina Justice Center, the North Carolina Housing Coalition, the Natural Resources Defense Council, and the Southern Alliance for Clean Energy filed in Docket No. E-2, Sub 1219 on July 23, 2020, as amended by the Joint Motion to Amend Settlement Agreements on Scope of Tariff On-Bill Pilots, filed in Docket Nos. E-7, Sub 1214 and E-2, Sub 1219

on September 19, 2022, (“Stipulation”) in which the parties agreed to collaborate to develop a tariffed on-bill (TOB) pilot program for residential customers to finance energy efficiency home improvements.

3. NCSEA was an active participant in the TOB Working group, established by the parties to the Stipulation, which developed the framework for the new energy efficiency program proposed in the above-captioned docket.

4. NCSEA is also actively involved in DEP’s energy efficiency collaborative, and NCSEA’s interest in cases involving energy efficiency has routinely been recognized by the Commission. *See, e.g.*, Docket No. E-2, Sub 1287 (Smart Saver Solar program); Docket No. E-2, Sub 1273 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1252 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1206 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1174 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1145 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1108 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1070 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1044 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1030 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1019 (DSM/EE cost recovery proceeding); Docket No. E-2, Sub 1002 (DSM/EE cost recovery proceeding); and Docket No. E-2, Sub 977 (DSM/EE cost recovery proceeding).

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

Ethan Blumenthal
Counsel for NCSEA

4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601
taylor@energync.org

4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601
ethan@energync.org

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/ Taylor Jones

Taylor Jones
N.C. State Bar No. 58831
Regulatory Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601
taylor@energync.org

VERIFICATION

Taylor Jones, first being duly sworn, deposes and says that she is the attorney for NCSEA; that she has read the foregoing Petition to Intervene and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of NCSEA.

This the 28th day of November, 2022.

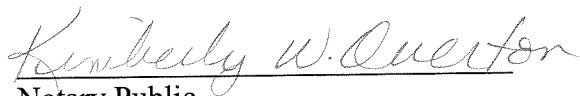


Taylor Jones

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 28th day of November, 2022.



Notary Public





Printed Name of Notary Public

My Commission Expires: 4-8-24

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 28th day of November, 2022.

/s/ Taylor Jones

Taylor Jones
N.C. State Bar No. 58831
Regulatory Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601
taylor@energync.org