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**OFFICIAL COPY  
FILED**

**SEP 24 2008**

Clerk's Office  
N.C. Utilities Commission

**VIA HAND DELIVERY**

September 24, 2008

Ms. Renne C. Vance  
Chief Clerk  
The NC Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4325

Re: Motion to Intervene in Docket No. E-7, Sub. 856

Dear Ms. Vance:

Enclosed please find the original and 30 copies of The Vote Solar Initiative's Motion to Intervene in Docket No. E-7, Sub. 856. All filings, correspondence and communications on or related to this docket should be sent to R. Sarah Compton, Esq. at the above-referenced address, with copies to Claudia Eyzaguirre, The Vote Solar Initiative, 300 Brannan Street, Suite 609, San Francisco, CA 94107. I have served the enclosed Motion on all parties to this proceeding.

Thank you for your assistance with this filing.

Very truly yours,



R. Sarah Compton, Esq.

Counsel for The Vote Solar Initiative

*Full Dist. msh*

**BEFORE THE STATE OF NORTH CAROLINA UTILITIES COMMISSION  
RALEIGH, NORTH CAROLINA  
DOCKET NO. E-7, SUB. 856**

**FILED**  
SEP 24 2008

**In the Matter of Application of Duke )  
Energy Carolinas, LLC For Approval )  
Of Solar Photovoltaic Distributed )  
Generation Program and for Approval )  
Of the Proposed Method of Recovery of )  
Associated Costs, Docket E-7, Sub. 856 )**

**MOTION TO INTERVENE**

Clerk's Office  
N.C. Utilities Commission

**MOTION TO INTERVENE**

Pursuant to Rules 1-7 and 1-19 of the Rules and Regulations of the North Carolina Public Utilities Commission ("Commission"), The Vote Solar Initiative ("Vote Solar") hereby moves to intervene in the above-referenced docket filed with the Commission on June 6, 2008, by the Duke Energy Carolinas, LLC ("Duke"). In support of this Motion, Vote Solar states as follows:

1. Vote Solar is a 501(c)(3) non-profit membership organization working on solar energy-related policy issues nationwide. Vote Solar has individual members in dozens of states including 800 in North Carolina. Vote Solar's members include entities engaged in the financing, design, manufacturing and installation of solar energy systems. Vote Solar's members are also owners of photovoltaic systems installed in the State of North Carolina. Vote Solar's members will be affected economically and otherwise by any decisions of this Commission on Duke's application and associated potential rate

increases. Vote Solar and its members accordingly fall within the zone of interest of this matter.

2. Vote Solar's mailing address is 300 Brannan Street, Suite 609, San Francisco, CA 94107.

3. Vote Solar's Counsel in this matter, to whom all correspondence should be addressed, is R. Sarah Compton, Esq., P.O. Box 12728, Raleigh, NC 27605. All email correspondence should be sent to [rscompton@nc.rr.com](mailto:rscompton@nc.rr.com) as well as Ms. Claudia Eyzaguirre, Vote Solar's Policy Advocate, at [claudia@votesolar.org](mailto:claudia@votesolar.org).

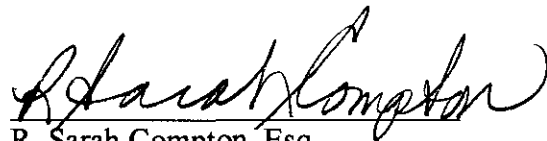
4. Vote Solar is nationally recognized for its experience and expertise in developing sound and sustainable policies for the development of solar energy resources and the subsequent job and other economic growth accompanying well-designed solar energy policies. Vote Solar has extensive experience and research in the generation and distribution of solar energy as well as the establishment of sound economic incentives for successful state solar energy programs. Vote Solar has available the most up-to-date, best available solar energy financial data modeling.

5. Vote Solar's intervention in the above-referenced docket will make this knowledge, research and data available to the Commission thus substantially aiding it in its decision-making in this proceeding.

6 Intervention by Vote Solar will not prejudice any other party or unduly delay this proceeding.

THEREFORE, Vote Solar respectfully requests that the Commission enter an order allowing Vote Solar to intervene in the above-referenced Docket No. E-7, Sub. 856.

Respectfully submitted this 24<sup>th</sup> day of September, 2008.

  
R. Sarah Compton, Esq.  
P.O. Box 12728  
Raleigh, NC 27605  
NC State Bar #22642  
(919) 812-4977

Counsel for The Vote Solar Initiative

**VERIFICATION**

STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

I, Claudia Eyzaguirre, Solar Advocate for the Vote Solar Initiative, verify that the facts set forth in the foregoing pleading and any exhibits, documents, or statements attached thereto 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.

Claudia Eyzaguirre  
Claudia Eyzaguirre, Solar Advocate, The Vote Solar Initiative

Date signed: Sept. 22<sup>nd</sup>, 2008

Sworn to and subscribed before me,  
This the 22 day of September, 2008

[Signature]  
Notary Public

My commission expires MAY 20, 2010



## **CERTIFICATE OF SERVICE**

I hereby certify that the following persons on the docket service list for Docket No. E-7, Sub. 856 have been served true and accurate copies of the foregoing Motion to Intervene by first class mail, postage pre-paid:

Mr. Robert W. Kaylor  
Robert W. Kaylor, P.A.  
3700 Glenwood Ave., Suite 330  
Raleigh, NC 27603

Mr. Leonard G. Green  
Assistant Attorney General  
NC Department of Justice  
P.O. Box 629  
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Daniel C. Higgins  
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Mr. Brian R. Franklin  
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Corporate Energy Manager  
The Kroger Company  
1014 Vine Street  
Cincinnati, OH 45202

Antoinette R. Wike  
Chief Counsel, Public Staff  
NC Utilities Commission  
4326 Mail Service Center  
Raleigh, NC 27699-4326

This the 24<sup>th</sup> day of September, 2008

A handwritten signature in cursive script, reading "R. Sarah Compton", written over a horizontal line.

R. Sarah Compton, Esq  
Bar No. 22642  
P.O. Box 12728  
Raleigh, NC 27605  
(919) 812-4977