

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. EMP-105, SUB 0**

In the Matter of:)
Application of Friesian Holdings, LLC for a) NCSEA’S PETITION TO
Certificate of Public Convenience and) INTERVENE
Necessity)

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. Many of NCSEA’s members are customers of the North Carolina Electric Membership Corporation (“NCEMC”) and its member cooperatives, and have an interest in ensuring compliance with North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”). NCEMC provides REPS compliance for 24 cooperatives and one municipality. *See, Order Granting Waivers of Commission Rule R8-67 and Providing Other Relief*, Docket Nos. E-100, Sub 118, EC-67, Sub 36, and EC-83, Sub 2 (December 18, 2017).

3. Friesian Holdings, LLC (“Friesian”) has triggered network upgrades costs in excess of \$100 million. *See, Motion to Stay by Cypress Creek Renewables*, p. 4, Docket No. E-100, Sub 101 (November 9, 2018). If constructed, these upgrades would “represent significant improvements to the transmission grid that will greatly increase the capacity of the grid in that area.” *Id.* NCSEA’s members, which include Cypress Creek Renewables, have later-queued projects that would be directly impacted by the construction or non-construction of network upgrades associated with Friesian.

4. The Bennettsville SS – Laurinburg 230 kV transmission line, to which Friesian will interconnect, is identified by Duke Energy Progress, LLC as “Constrained Infrastructure[.]” *Testimony of Sara Baldwin Auck on behalf of the Interstate Renewable Energy Council, Inc.*, Exhibit SBA-Direct-8, Docket No. E-100, Sub 101 (November 19, 2018). Network upgrades associated with Friesian may render this area no longer constrained, allowing for the interconnection of additional renewable energy resources.

5. NCSEA’s participation in this docket will bring critical insight, knowledge, and understanding to the proceeding, and no other party can adequately represent NCSEA’s interests.

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

Peter H. Ledford
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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,



N.C. State Bar No. 42999
General Counsel
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VERIFICATION

Peter H. Ledford, 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 29 day of July, 2019.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

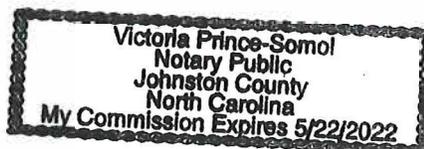
Sworn to and subscribed before me,

this the 29 day of July, 2019.

[AFFIX SEAL OF NOTARY]

Victoria Prince-Somol
Notary Public

Victoria Prince-Somol
Printed Name of Notary Public
My Commission Expires: 5-22-2022



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 29 day of July, 2019.



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