

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 180

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	SUNRISE MOVEMENT
Investigation of Proposed Net Metering)	DURHAM HUB'S PETITION TO
Policy Changes)	INTERVENE
)	

Pursuant to the North Carolina Utilities Commission's ("NCUC" or "Commission") Rules R1-5, R1-7, and R1-19, Sunrise Movement Durham Hub ("Sunrise Durham"), through counsel, files this petition to intervene in the above-captioned docket, and provides the following information in support of this petition:

1. Sunrise Durham is the local chapter of Sunrise Movement Education Fund ("Sunrise Movement"). Sunrise Movement is a nonprofit corporation organized and existing under the laws of the District of Columbia. All of Sunrise Durham's members reside in the State of North Carolina. Further, the majority of Sunrise Durham's members are customers of Duke Energy Progress, LLC or Duke Energy Carolinas, LLC (collectively, the "Companies").

2. Sunrise Movement is a national youth-led movement dedicated to stopping climate change and creating green jobs in the process. Sunrise Durham is the local, Durham-based hub of Sunrise Movement, and Sunrise Durham's active membership is deeply committed to furthering the above-stated goals of halting the climate crisis and creating green jobs. Among other things, Sunrise

Durham advocates for the proliferation of rooftop solar, which will move North Carolina toward sustainable energy and thereby help avert the climate crisis.

3. Sunrise Durham supports a transition to clean renewable energy, which includes, but is not limited to, stopping construction of all fossil fuel infrastructure and ending reliance upon fossil fuels.

4. In order to transition off of fossil fuels, Sunrise Durham advocates for increased reliance upon rooftop solar. Participation in the above-captioned docket goes to the heart of this mission by making roof top solar financially feasible for more home/building owners in NC.

5. Sunrise Durham is concerned that the Companies' net energy metering proposal will undermine the availability of solar energy. Therefore, Sunrise Durham seeks to intervene in the present docket for purposes of studying the Companies' proposal. Sunrise Durham anticipates offering comments for the Commission's consideration concerning the impacts of the Companies' proposal upon rooftop solar and whether the Companies' proposal accurately reflects both the costs and benefits of rooftop solar.

6. For these reasons, among others, Sunrise Durham has a direct vested interest in the relief sought by the Companies in the above-referenced docket.

7. Sunrise Durham's mailing address is 1121 Apogee Drive, Durham, North Carolina 27713.

8. The attorney for Sunrise Durham to whom all correspondence and filings in this docket can be addressed is Matthew D. Quinn, Lewis & Roberts,

PLLC, 3700 Glenwood Ave., Ste. 410, Raleigh, North Carolina 27612. Pursuant to Commission Rule R1-39, service by email is acceptable and may be sent to mdq@lewis-roberts.com.

WHEREFORE, Sunrise Durham respectfully requests that it be allowed to intervene in the above-mentioned docket.

This the 29th day of March, 2022

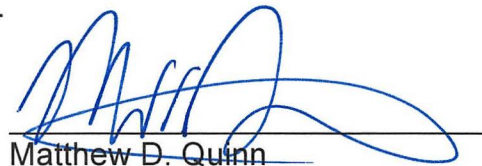
/s/ Matthew D. Quinn
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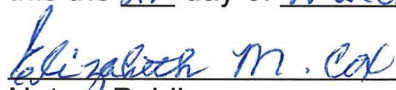
VERIFICATION

I, Matthew D. Quinn, verify that the contents of the foregoing Petition to Intervene 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. I am authorized to sign this verification on behalf of Sunrise Durham.

This the 29th day of March, 2022.


Matthew D. Quinn

Sworn to and subscribed before me,
this the 29th day of March, 2022.


Notary Public

My commission expires: June 6, 2023



CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon all counsel of record by email transmission.

This the 29th day of March, 2022.

/s/ Matthew D. Quinn

Matthew D. Quinn

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