

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET No. E-7, SUB 1275

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Application by Duke Energy  
Carolinas, LLC for Approval of  
Electric Vehicle-to-Grid Pilot  
Program Pursuant to N.C. Gen.  
Stat. § 62-133.9 and Commission  
Rule R8-68

**VOTE SOLAR PETITION  
TO INTERVENE**

NOW COMES Vote Solar, pursuant to Rule R1-19, Rules of the North Carolina Utilities Commission, and through the undersigned counsel petitions to intervene in the instant docket. In support of this petition, Vote Solar states:

1. Vote Solar is a non-profit, grassroots organization, established in 2002, that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation and other distributed energy resources accessible and cost-effective. Vote Solar achieves its objectives by advocating at the local, state, and federal levels to remove regulatory barriers and implement policies and programs to bring solar to scale.
2. Vote Solar has over 90,000 members, nationally, and 1,000 members in North Carolina, including members that receive electrical service from Duke Energy Carolinas, LLC ("DEC").
3. Vote Solar focuses in state regulatory proceedings on rate design and public policy issues related to consumer access to distributed energy resources. Vote Solar has actively participated in utility commission proceedings across the

country involving net metering, interconnection, rate design, and resource procurement, including in: Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, South Carolina, Utah, Vermont, and Wisconsin.

4. The North Carolina Utilities Commission ("NCUC" or "Commission") has permitted Vote Solar to intervene in multiple dockets since 2018. Vote Solar has also participated in and provided feedback in the North Carolina utility stakeholder engagement process on matters germane to net metering, rate design, and integrated resource and distribution planning, among other things.

5. Vote Solar's interest in the instant proceeding is to support the Vehicle-to-Grid pilot program proposal of DEC, and to offer comments on data tracking.

6. Vote Solar's comments on the DEC Vehicle-to-Grid pilot program are being filed contemporaneously with this Petition to Intervene to meet the Commission's filing deadline for comments.

7. The correct name, post-office address and electronic mailing address of Vote Solar is identified below.

VOTE SOLAR  
360 22nd Street  
Suite 730  
Oakland, CA 94612

Care of:  
Jake Duncan  
Regulatory Director, Southeast  
[jduncan@votesolar.org](mailto:jduncan@votesolar.org)

8. Pursuant to Rule RI-39, Rules of the North Carolina Utilities Commission, Vote Solar agrees to accept electronic service of all pleadings and other papers filed in this docket.

9. Vote Solar's attorney, to whom all communications and pleadings should be addressed, is identified below.

David T. Drooz  
FOX ROTHSCHILD LLP  
434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
Telephone: 919-719-1258  
E-mail: ddrooz@foxrothschild.com

WHEREFORE, Vote Solar respectfully requests that the Commission issue an order allowing it to intervene in this proceeding and to otherwise exercise all rights of a party to this proceeding.

Respectfully submitted on November 14, 2022.

FOX ROTHSCHILD LLP

/s/ David T. Drooz

David T. Drooz  
NC Bar No. 10310  
ddrooz@foxrothschild.com  
434 Fayetteville Street,  
Suite 2800  
Raleigh, NC 27601

*Attorney for Vote Solar*

COUNTY OF Hamilton  
STATE OF Tennessee VERIFICATION

Jake Duncan, first being duly sworn, depose and state that I am Regulatory Director – Southeast for Vote Solar; that I have read the foregoing Petition to Intervene and that the same is true of my own personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, I believe them to be true; and that I am authorized to sign this verification on behalf of Vote Solar.

By: [Signature]  
Jake Duncan

Sworn to and subscribed before me  
this 11 day of November, 2022.

[SEAL]

[Signature]  
Notary Public (Signature)

Amber D. Clark  
Notary Public (Printed Name)

My Commission Expires:

8/25/2025  
(DATE)



## CERTIFICATE OF SERVICE

I hereby certify that, on November 14, 2022, the foregoing Vote Solar Petition to Intervene was served upon all parties and counsel of record, and on North Carolina Public Staff, by electronic mail, or depositing the same in the United States mail, postage prepaid.

FOX ROTHSCHILD LLP

/s/ David T. Drooz

David T. Drooz