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July 11, 2022

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Via Electronic Submittal

**Re: In the Matter of
Duke Energy Progress, LLC's Request to Initiate Technical Conference
Regarding the Projected Transmission and Distribution Projects to be
Included in Performance-Based Regulation Application
Docket No. E-2, Sub 1300
*Vote Solar's Petition to Intervene and Notice of Intent to Participate in
Conference***

Dear Ms. Dunston:

Under cover of this letter and at the request of Vote Solar (Company), we herewith provide Vote Solar's Petition to Intervene and Notice of Intent to Participate in Conference.

If you should have any questions concerning this filing, please let me know.

Thank you and your staff for your assistance.

Sincerely,
/s/ David T. Drooz
David T. Drooz
Attorney for
Vote Solar

mwg

Enclosures

cc: All parties of record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET No. E-2, SUB 1300

In the matter of: Duke Energy Progress, LLC's Request to Initiate Technical Conference Regarding the Projected Transmission and Distribution Projects to be Included in Performance-Based Regulation Application	VOTE SOLAR'S PETITION TO INTERVENE AND NOTICE OF INTENT TO PARTICIPATE IN CONFERENCE
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Vote Solar, pursuant to Rule R1-19, Rules of the North Carolina Utilities Commission, petitions to intervene in the instant docket and notices its intent to participate in the related technical conference. In support of this petition and notice, 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 110,000 members, nationally, including members that receive electrical service from Duke Energy Progress, LLC ("DEP") (and Duke Energy Carolinas, LLC).

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. On information and believe, the North Carolina Utilities Commission (“NCUC” or “Commission”) has permitted Vote Solar to intervene in at least ten dockets since 2018. Vote Solar has also participated 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 harness this breadth of knowledge and experience while advocating for policies that utilize solar generation and distributed energy sources, broadly, to effectively manage electricity costs for consumers.

6. If permitted to intervene, Vote Solar expects to offer evidence on, among other things, performance-based regulation (“PBR”), generally, and in particular on the efficacy of PBR as it pertains to DEP’s projected transmission and distribution projects and its potential impacts on DEP ratepayers, including Vote Solar’s members. Vote Solar, thus, moves to intervene so it can participate fully in the instant docket.

7. Vote Solar further notifies NCUC and the parties of its intent to participate in the technical conference, as provide by the Commission’s *Order Scheduling Technical Conference and Setting Procedures for Technical Conference* entered in this docket on June 15, 2022.

8. 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:
Lindsey Hallock,
Senior Regional Director Southeast
lindsey@votesolar.org

9. Pursuant to Rule R1-39, Rules of the North Carolina Utilities Commission, Vote Solar agrees to accept electronic service of all pleadings and other papers filed in this docket.

10. Vote Solar's attorneys, to whom all communications and pleadings should be addressed, are identified below.

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R. Taylor Speer
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2 West Washington Street
Suite 1100
Greenville, SC 29607
Telephone: 864-751-7665

[Mr. Speer is admitted in SC and FL only; an application for admission pro hac vice forthcoming or filed contemporaneously with this petition.]

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

[signature and client verification pages follow]

Respectfully submitted on July 11, 2022.

FOX ROTHSCHILD LLP

/s/ David T. Drooz

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[Mr. Speer is admitted in SC and FL only;
an application for admission pro hac vice
forthcoming or filed contemporaneously
with this petition.]

Attorneys for Vote Solar

CERTIFICATE OF SERVICE

I hereby certify that, on July 11, 2022, the foregoing document was served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

FOX ROTHSCHILD LLP

/s/ David T. Drooz

David T. Drooz

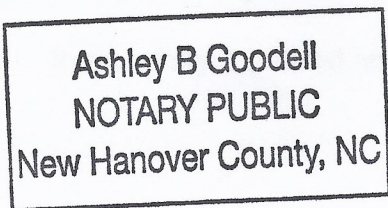
VERIFICATION

Lindsey Hallock, first being duly sworn, deposes and says that she is Senior Regional Director Southeast of Vote Solar; 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 thing 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 Vote Solar.

This 11 day of July 2022.

Sworn and subscribed before me on this 11th day of July 2022. VOTE SOLAR

Ashley B. Goodell
Notary Public
Commission Expires: 8/8/2024



Lindsey Hallock
By: Lindsey Hallock, its Senior Regional Director Southeast