

August 14, 2017

Ms. Lynn Jarvis  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Raleigh, NC 27603

**RE:           *North Carolina Clean Energy Business Alliance***  
***In the matter of Rulemaking Proceeding to Implement G.S. 62-110.8***  
***Docket No. E-100, Sub 150***  
***PETITION TO INTERVENE***

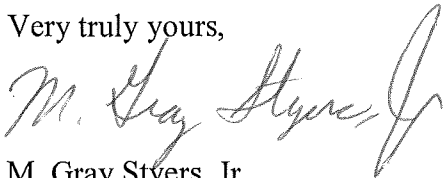
Dear Ms. Jarvis:

In compliance with the Commission's Order Initiating Rulemaking Proceeding in the above-referenced docket, we are herewith submitting this Petition to Intervene on behalf of North Carolina Clean Energy Business Alliance ("NCCEBA").

If you have any questions or comments regarding this filing, please do not hesitate to call me.

Thank you in advance for your assistance.

Very truly yours,



M. Gray Styers, Jr.

pbb

Enclosures

cc:     Christopher J. Ayers, Esq.  
        David Drooz, Esq.  
        Dianna Downey, Esq.  
        Layla Cummings, Esq.  
        Parties of Record

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, Sub 150

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:

Rulemaking Proceeding to Implement  
G.S. 62-110.8

PETITION TO INTERVENE

Pursuant to Commission Rule R1-19 and the Commission's Order Initiating Rulemaking Proceeding to implement the requirements of the newly enacted G.S. 62-110.8 issued on July 28, 2017, in the above-referenced docket, North Carolina Clean Energy Business Alliance ("NCCEBA" or "Petitioner"), petitions the Commission for leave to intervene in this proceeding.

In support of its Petition, NCCEBA states the following:

1. The name and mailing address of the Petitioner is:

North Carolina Clean Energy Business Alliance  
811 Ninth Street  
Suite 120-158  
Durham, NC 27705

2. The name and address of Petitioner's attorneys are:

M. Gray Styers, Jr.  
Karen M. Kemerait  
Smith Moore Leatherwood LLP  
434 Fayetteville Street, Suite 2800  
Raleigh, NC 27601

3. NCCEBA is a non-profit trade association created to promote the common interests of clean energy businesses in North Carolina. It is comprised of and represents all types of businesses in the clean energy sector including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy

4. NCCEBA and its members were actively involved in the negotiations that led to House Bill 589 -- ultimately Session Law 2017-192 -- which will be, in part, codified as G.S. 62-110.8. In addition, many of NCCEBA's members are developers of renewable energy projects and will likely be participants in the competitive solicitation programs established pursuant to G.S. 62-110.8. Thus, NCCEBA and its members have an interest in ensuring that the statute is implemented in accordance with the intent of the legislature and consistent with the public interest.

5. As an active participant in, and representative of those involved in, the sound development of clean energy, Petitioner has a clear, direct and substantial interest in the matters to be addressed by the Commission in this docket, and in light of unique mission, membership, and focus of NCCEBA, no other party can adequately represent NCCEBA's interests. In addition, NCCEBA's participation in this docket will bring critical insight, knowledge, and understanding to these proceeding.

6. NCCEBA requests that any notices, filings or other communications in this docket be served on the following:

M. Gray Styers, Jr., Esq.  
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Mr. Christopher M. Carmody  
Executive Director  
North Carolina Clean Energy Business Alliance  
811 Ninth Street, Suite 120-158  
Durham, NC 27705  
E-mail: [Director@ncceba.com](mailto:Director@ncceba.com)  
Telephone: (919) 608-1060

7. Pursuant to Commission Rule R1-39, NCCEBA agrees to accept electronic service of all filings in this docket.

WHEREFORE, for the foregoing reasons, NCCEBA respectfully requests that the Commission:

1. Grant Petitioner's request that it be permitted to intervene and become a party to this docket;
2. Allow Petitioner all rights to participate fully in this docket as granted to parties pursuant to Commission Rule R1-19(a); and
3. For such other and further relief as the Commission deems just and proper.

Respectfully submitted this 15<sup>th</sup> day of August, 2017.

SMITH MOORE LEATHERWOOD LLP

BY: 

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Attorneys for: North Carolina Clean Energy  
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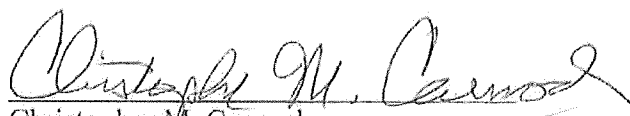
STATE OF NORTH CAROLINA

DURHAM COUNTY

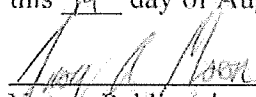
VERIFICATION

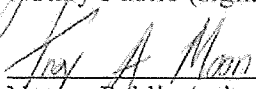
I, Christopher M. Carmody, being first duly sworn, deposes and says that he is Executive Director for North Carolina Clean Energy Business Alliance, the Petitioner, and do hereby declare that I am duly authorized to act on behalf of the Petitioner, that I have read the foregoing Petition to Intervene and that the same is true and accurate to my personal knowledge and belief.

This 14<sup>th</sup> day of August, 2017.

  
Christopher M. Carmody  
North Carolina Clean Energy Business  
Alliance

Sworn to and subscribed before me  
this 14<sup>th</sup> day of August, 2017.

  
Notary Public (signature)

  
Notary Public (printed)

My Commission expires: 3/13/2022

[Notary Seal]

TROY A. MOON  
NOTARY PUBLIC  
Durham County, North Carolina  
My Commission Expires 3-13-2022

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Petition to Intervene has been duly served upon counsel of record for all parties to this docket by either depositing a true and exact copy of same in a depository of the United States Postal Service, first-class postage prepaid, and/or by electronic delivery as follows:

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and Duke Energy Progress, LLC

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This the 15<sup>th</sup> day of August, 2017.

SMITH MOORE LEATHERWOOD LLP

BY: 

M. Gray Styers, Jr.

Attorneys for: North Carolina Clean Energy  
Business Alliance