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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1073

FILED
MAR 17 2015
Clerk's Office
N.C. Utilities Commission

In the Matter of:)
Application of Duke Energy Carolinas, LLC)
for Approval of Demand-Side Management) NCSEA'S
and Energy Efficiency Cost Recovery Rider) MOTION TO INTERVENE
Pursuant to N.C. Gen. Stat. § 62-133.9 and)
Commission Rule R8-69)

MOTION 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 moves to intervene in the above-referenced docket. In support of this motion, 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. NCSEA has frequently appeared before this Commission as an intervenor in dockets involving integrated resource planning ("IRP"). *See, e.g.*, NCUC Docket No. E-100, Sub 141; NCUC Docket No. E-100, Sub 137; NCUC Docket No. E-100, Sub 128; NCUC Docket No. E-100, Sub 118. IRP, however, is "not intended to provide an occasion for the issuance of mandatory orders requiring substantive changes in a given utility's operations." *Utilities Comm. v. N.C. Electric Membership Corp.*, 105 N.C. App.

136, 143, 412 S.E.2d 166, 170 (1992). Consequently, a party like NCSEA that desires a specific utility “to take or to refrain from taking some specific substantive action[.]” *Id.* at 144, 412 S.E.2d at 171, must seek to involve itself in a specific, substantive proceeding, such as this one.

3. NCSEA was a chief proponent of North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS law”), has substantial organizational awareness of the law and its implementation, and has a direct interest in seeing the policies and goals of the REPS law achieved in a manner consistent with the legislative intent. The interest of NCSEA and its members in the REPS law, renewable energy, and energy efficiency extends to dockets such as this one for a multitude of reasons. NCSEA’s interest in cases such as this one has been recognized by the Commission. *See, e.g.,* NCUC Docket No. E-7, Sub 1050 (Vintage 6 rider); NCUC Docket No. E-7, Sub 1031 (Vintage 5 rider); NCUC Docket No. E-7, Sub 1001 (Vintage 4 rider); NCUC Docket No. E-7, Sub 831 (NCSEA was permitted to intervene where Duke Energy Carolinas, LLC sought approval of Save-a-Watt and its first energy efficiency rider); *see also* NCUC Docket No. E-100, Sub 110 (a pre-REPS complaint brought by NCSEA against Duke Energy Carolinas, LLC to require increased use of energy efficiency).

4. NCSEA’s participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

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

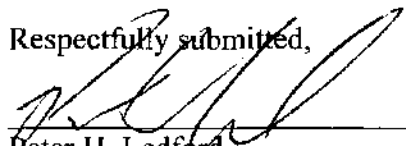
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6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted,

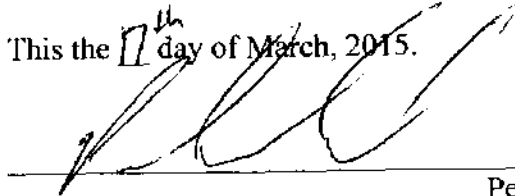


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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Motion 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 17th day of March, 2015.



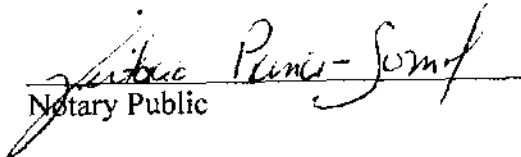
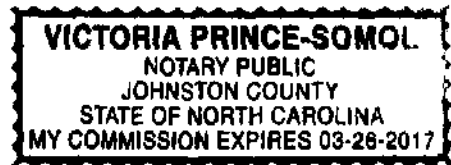
Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 17 day of March, 2015.

[AFFIX SEAL OF NOTARY]


Notary Public

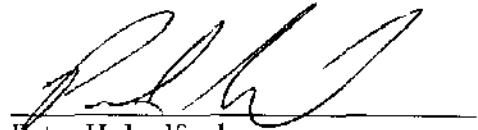
Victoria Prince-Somol
Printed Name of Notary Public

My Commission Expires: 3-26-2017

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Motion 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 17th day of March, 2015.



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