

**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)**

**NCSEA’S PETITION TO
INTERVENE AND NOTICE
OF INTENT TO
PARTICIPATE**

NCSEA’S PETITION 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 petitions to intervene in the above-referenced docket. In support of this petition, 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 was actively involved in the development of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and requirements of the session law implemented in a manner consistent with legislative intent. NCSEA was also actively involved in Docket No. E-100, Sub 178 where the Commission adopted rules governing performance-based regulation.

3. NCSEA's members are not only customers of electric service providers, including Duke Energy Progress, LLC, they are also proponents of renewables-based generation and energy efficiency. As such, they have a strong interest in the rates and charges for electricity in this State.

4. NCSEA's interest in cases such as this one has been previously recognized by the Commission. See, e.g., Docket No. E-7, Sub 989 (NCSEA was permitted to intervene in Duke Energy Carolinas, LLC's 2011 general rate case); Docket No. E-2, Sub 1023 (Progress Energy Carolinas, Inc.'s 2012-13 general rate case); Docket No. E-7, Sub 1026 (Duke Energy Carolinas, LLC's 2013 general rate case); Docket No. E-22 Sub 532 (Dominion North Carolina Power's 2016 general rate case); Docket No. E-2, Sub 1142 (Duke Energy Progress, LLC's 2017 general rate case); Docket No. E-7, Sub 1146 (Duke Energy Carolinas, LLC's 2017 general rate case); Docket No. E-7, 1214 (Duke Energy Carolinas, LLC's 2019 general rate case); and Docket No. E-2, Sub 1219 (Duke Energy Progress, LLC's 2019 general rate case).

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

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


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General Counsel for NCSEA
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7. 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 and provides the Commission with notice of its intent to participate in the technical conference regarding Duke Energy Progress, LLC's projected transmission and distribution projects.

Respectfully submitted this the 5th day of July 2022.




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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 Petition 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 5th day of July 2022.


Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

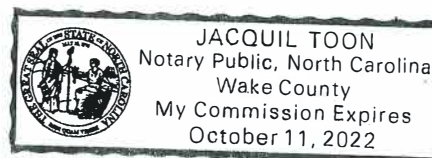
this the 5th day of July 2022.

[AFFIX SEAL OF NOTARY]


Notary Public


Printed Name of Notary Public

My Commission Expires: 10/11/2022



CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition 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 5th day of July 2022.



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