

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

**DOCKET NO. E-2, SUB 1197**

**DOCKET NO. E-7, SUB 1195**

<p><b>In the Matter of</b></p> <p><b>Application by Duke Energy Carolinas</b></p> <p><b>LLC and Duke Energy Progress, LLC for</b></p> <p><b>Approval of Proposed Electric</b></p> <p><b>Transportation Pilot</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p><b>PETITION TO INTERVENE OF</b></p> <p><b>ENVIRONMENTAL DEFENSE FUND</b></p>
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Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7 and R1-19, the Environmental Defense Fund ("EDF") hereby petitions to intervene in the above- referenced docket. In support of this motion, EDF states as follows:

1. EDF is a national non-profit corporation engaged in linking science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. EDF has over 300,000 members nationwide and has 8,544 members in North Carolina. EDF has been active in North Carolina working on environmental policies including clean energy, climate change, oceans and sustainable agriculture.

2. EDF, through its current programs aimed at various clean energy policies, including: (1) eliminating barriers to adoption of clean energy; (2) advancing "smart" electric and gas system modernization; and (3) advancing building and vehicle electrification, is pursuing initiatives at the state and national levels designed to ensure that grid investments maximize their potential to create a cleaner, more resilient electric and gas system. Specifically, EDF works extensively with public utility commissions, industry, academia and other stakeholders across the country and in this region to evaluate, improve and

advance electric and gas system investment plans so that they realize a full range of resiliency, environmental, economic and consumer benefits. EDF aims to ensure that clean energy and grid modernization investments provide: (1) benefits that outweigh the costs of the investments; and (2) accountability that dollars spent are providing tangible benefits. EDF also supports various clean energy policies before state public utility commissions.

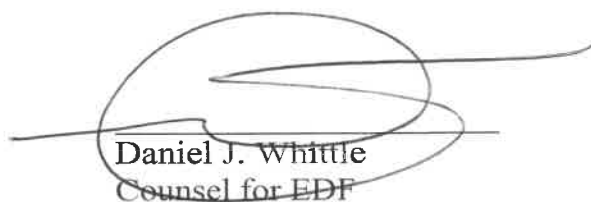
3. EDF's members have an interest in the Electric Transportation Pilot filed Duke Energy. Specifically, EDF's members have an interest in integrating distributed energy resources, including electric vehicles, with the grid; modernizing the electric grid; and providing third parties with timely access to their energy usage data.

4. EDF's address is 4000 Westchase Boulevard, Suite 510, Raleigh, NC 27607.

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

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

Respectfully submitted,



Daniel J. Whittle  
Counsel for EDF

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VERIFICATION

Daniel J. Whittle, first being duly sworn, deposes and says: that he is the attorney for Environmental Defense Fund; 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 Environmental Defense Fund.

April 23, 2019.

  
Daniel J. Whittle

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

[AFFIX NOTARY SEAL]

Sworn to and Subscribed before me by Daniel J. Whittle  
this 23<sup>rd</sup> day of April, 2019

  
Notary Public

  
Typed or Printed Notary Name

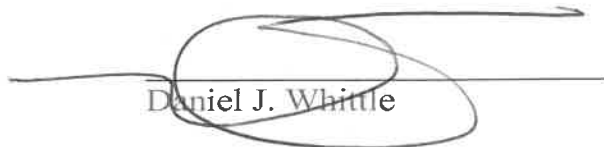


My commission expires: 7-10-2022

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 first class United States mail, postage prepaid, or by email transmission with the party's consent.

This \_\_\_ day of April, 2019.

  
Daniel J. Whittle