

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1175**

**In the Matter of: )  
Application of Duke Energy )  
Progress, LLC for Approval of )  
Renewable Energy and Energy )  
Efficiency Portfolio Standard )  
(REPS) Compliance Report and )  
Cost Recovery Rider Pursuant to )  
N.C. Gen. Stat. § 62-133.8 and )  
Commission Rule R8-67 )**

**PETITION OF NCSEA TO  
INTERVENE**

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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. Many of NCSEA's members are customers of Duke Energy Progress, LLC.
3. NCSEA has frequently appeared before this Commission as an intervenor, in dockets concerning applications for cost recovery under North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard. *See, e.g.*, Commission Docket No. E-2, Sub 1144; Commission Docket No. E-2, Sub 1109; Commission Docket No. E-2, Sub

1071; Commission Docket No. E-2, Sub 1043; Commission Docket No. E-2, Sub 1032; Commission Docket No. E-2, Sub 1020; Commission Docket No. E-2, Sub 1000; Commission Docket No. E-2, Sub 974; and Commission Docket No. E-2, Sub 948.

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

Peter H. Ledford  
General Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

Benjamin W. Smith  
Regulatory Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 111  
ben@energync.org

5. 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,



Benjamin W. Smith  
N.C. State Bar No. 48344  
Regulatory Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 111  
ben@energync.org

**VERIFICATION**

Benjamin W. Smith, first being duly sworn, deposes and says that he is an 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 28<sup>th</sup> day of June, 2018.



Benjamin W. Smith

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 28<sup>th</sup> day of June, 2018.

[AFFIX SEAL OF NOTARY]

Daniel G. Brookshire  
Notary Public

**Daniel G Brookshire, Notary Public  
Orange County, North Carolina  
My Commission Expires 7/2/2022**

Daniel G. Brookshire  
Printed Name of Notary Public  
My Commission Expires: 7-2-2022

**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 28<sup>th</sup> day of June, 2018.



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