

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1287

DOCKET NO. E-7, SUB 1261

IN THE MATTER OF:)

Duke Energy Progress, LLC’s Application for)
Approval of Smart \$aver Solar Energy)
Efficiency Program)

**PETITION TO INTERVENE
OF SOLAR ENERGY INDUSTRIES
ASSOCIATION**

IN THE MATTER OF:)

Duke Energy Carolinas, LLC’s Application for)
Approval of Smart \$aver Solar Energy)
Efficiency Program)

COMES NOW the Solar Energy Industries Association (“SEIA”), by and through counsel, pursuant to Rules R1-5, R1-7, and R1-19 of the North Carolina Utilities Commission’s (the “Commission”) Rules and Regulations, and makes this petition to intervene in the above-captioned dockets. In support of this petition, SEIA states the following grounds:

1. SEIA is the national trade association of the U.S. solar energy industry and represents organizations that promote, manufacture, install and support the development of solar energy. Collectively, these organizations employ more than two hundred sixty thousand (260,000) people in the United States.

2. Since 1974, SEIA has been a driving force in the building of a strong solar industry in America and in the advancement of solar energy and energy storage technology. SEIA works with over one thousand (1,000) member companies and other strategic partners to advocate for policies that promote solar jobs in diverse communities and for

market rules that promote competition, fairness and the growth of reliable, low-cost solar power.

3. SEIA's mission is to advocate for a transformed energy supply, delivery and storage system, such that solar electric and thermal technologies fuel this country's economy, along with other clean, reliable, affordable renewable energy resources. Consistent with its mission, SEIA engages in advocacy and education to foster solar development by expanding markets, removing market barriers, and educating the public on the benefits of solar energy. To advance its mission, SEIA actively participates in state public utility commission proceedings, testifies before state legislative bodies, and hosts seminars and events on solar policy issues.

4. In North Carolina, SEIA's members employ over six thousand (6,000) people, have performed over twenty-six thousand (26,000) solar installations and have invested collectively over \$10 billion directly in the state.

5. SEIA's members include many national solar companies that own and operate projects and employ residents in North Carolina, as well as companies that list a specific operating address in North Carolina. SEIA's members, including its members in North Carolina, are engaged in manufacturing solar photovoltaic equipment, developing solar photovoltaic projects, and providing solar energy equipment, services and expertise to retail, commercial and industrial customers. SEIA's members develop, construct, own, operate, finance, and otherwise service solar generating facilities across the state. SEIA's members plan to develop, construct, own, operate, and otherwise service future solar projects in North Carolina, the success of which could depend on the results of these proceedings.

6. SEIA's members are directly impacted by policies related to installation of rooftop solar. As a result, SEIA and the members it represents will be substantially and specifically affected by the result of these proceedings. SEIA's participation in these dockets will bring important insights, knowledge and understanding.

7. The name and principal business address of the Petitioner is:

Solar Energy Industries Association
1425 K Street NW, Suite 1000
Washington, D.C. 20005

8. Pursuant to Rule R1-22 of the Commission's Rules of Practice and Procedure, SEIA is represented in this proceeding by counsel who is duly licensed to practice law in North Carolina:

James C. "Cal" Cunningham III
N.C. Bar No. 27216
Cunningham Law, PLLC
Two Hannover Square
434 Fayetteville Street, Suite 2330
Raleigh, North Carolina 27601
Direct: (919) 295-2270
Email: Cal@CalCunninghamNC.com

9. Pursuant to Commission Rule R1-39, SEIA consents to service via electronic mail and requests that all communications regarding this docket be directed to SEIA's counsel of record.

10. No other party will adequately represent SEIA's unique interest in this case. Notwithstanding its unique interests and need to participate as a party to protect those interests, SEIA intends to proactively work with other parties to minimize duplication and to contribute to the development of the record in a meaningful and efficient manner.

WHEREFORE, SEIA respectfully requests that the Commission grant its petition to intervene in these proceedings and to participate fully as a party in order to advocate for it and its members' unique and substantial interests in this case.

Respectfully submitted this 18th day of January, 2022.

/s/ James C. "Cal" Cunningham III

James C. "Cal" Cunningham III

N.C. Bar No. 27216

Cunningham Law, PLLC

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VERIFICATION

I, James Calvin Cunningham III, first being duly sworn, deposes and says that he is the attorney for the Solar Energy Industries Association; 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 the Solar Energy Industries Association.

This the 18th day of JANUARY 2022.

[Signature]
James Calvin Cunningham III

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

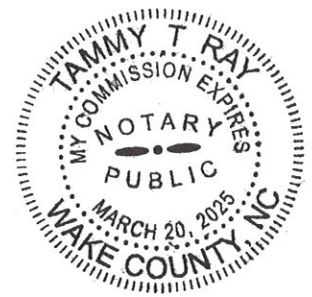
This the 18 day of January, 2022

[Signature]
Notary Public

[AFFIX SEAL OF NOTARY]

Tammy T. Ray
Printed Name of Notary Public

My Commission Expires: March 20, 2025



CERTIFICATE OF SERVICE

I hereby certify that a copy of the Petition to Intervene of SEIA as filed today in Docket No. E-2, Sub 1287, and Docket No. E-7, Sub 1261 has been served on all parties of record on the official service list by electronic mail transmission, where parties have consented to electronic service, or by deposit in the U.S. Mail, first class, postage prepaid, on this day, January 18, 2022.

/s/ James C. "Cal" Cunningham III
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