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SEP 22 2008
N.C. Utilities Commission
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September 22, 2008

Ms. Renne Vance
North Carolina Utilities Commission
430 N. Salisbury Street
5th Floor – Clerks Office
4325 Mail Service Center
Raleigh, NC 27699-4325

Re: In the Matter of Implementing a Tracking System for Renewable Energy
Certificates Pursuant to Session Law 2007-397
(NCUC, Docket No. E-100, Sub 121)
Our File No. 32965.00001

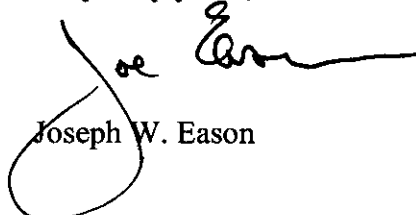
Dear Ms. Vance:

Enclosed for filing on behalf of GreenCo Solutions, Inc. ("GreenCo") are an original and thirty (30) copies of GreenCo's Motion to Intervene, relating to the above-referenced matter.

Also enclosed is an additional copy of the document to be stamped as "filed" and returned to me via my courier.

Thank you for your assistance in this matter. With best regards, I am,

Very truly yours,


Joseph W. Eason

Enclosures

cc. All parties of record (w/enc.)

clerk
AG
7 Comm
Bennink
Kirby
Watson
Hoover
Kitt
Hilburn
Jones
Sessions
Eason
P/Eason Dir.
Legal 3
Acctg 3
Elec 2
Econ 4

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 121

FILED
SEP 22 2008
Office of the Secretary
N.C. Utilities Commission

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Implementing a Tracking)
System for Renewable Energy Certificates) **MOTION TO INTERVENE OF**
Pursuant to Session Law 2007-397) **GREENCO SOLUTIONS, INC.**

Pursuant to Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission (the "Commission") and the Commission's Order in this docket entered on September 4, 2008, GreenCo Solutions, Inc. ("GreenCo"), hereby moves to intervene in the above-captioned proceeding on behalf of its member electric membership corporations. In support of its motion, GreenCo shows the Commission the following:

1. GreenCo is a non-profit corporation organized pursuant to Chapter 55A of the laws of the State of North Carolina, with its corporate headquarters located at 5234 Greens Dairy Road, Raleigh, North Carolina 27616.

2. GreenCo was organized on behalf of the following electric membership corporations ("EMCs"), each of which is organized under Chapter 117 of the North Carolina General Statutes as a non-profit electric membership corporation, is headquartered in North Carolina, and is actively engaged in the retail distribution and sale of electricity within North Carolina to its member-owners:

Albemarle EMC
Brunswick EMC
Carteret-Craven EMC
Edgecombe-Martin EMC
French Broad EMC

Blue Ridge EMC
Cape Hatteras EMC
Central EMC
Four County EMC
Haywood EMC

Jones-Onslow EMC
Pee Dee EMC
Pitt & Green EMC
Roanoke EMC
Surry-Yadkin EMC
Tri-County EMC
Wake EMC

Lumbee River EMC
Piedmont EMC
Randolph EMC
South River EMC
Tideland EMC
Union EMC

3. GreenCo was formed primarily for the purpose of assisting member EMCs fulfill some of the obligations arising from the enactment of Session Law 2007-397 ("Senate Bill 3"), including the Renewable Energy Portfolio Standards ("REPS") of that legislation. GreenCo is not a power supplier or a public utility. Currently, the three primary services which are provided by GreenCo include compliance planning and reporting, energy efficiency program development and management, and assistance in the development and monitoring of renewable energy activities and demonstration projects.

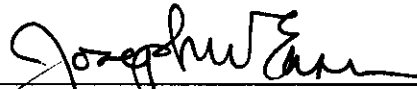
4. GreenCo and its member EMCs have a direct interest in the establishment of the tracking system which is the subject of this docket, as the purchase, sale and exchange of Renewable Energy Certificates ("RECs") will play a significant role in fulfilling the REPS and other obligations of the retail electric suppliers under Senate Bill 3. The interests of GreenCo and its member EMCs are not adequately represented by any other party, and GreenCo should not be consolidated with any party or group of parties.

5. All correspondence related to this proceeding should be addressed to:

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WHEREFORE, GreenCo respectfully requests that the Commission allow it to intervene in this proceeding and become a party thereto for all purposes.

Respectfully submitted, this 22nd day of September, 2008.



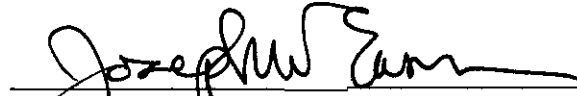
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ATTORNEYS FOR GREENCO SOLUTIONS,
INC.

VERIFICATION

Christopher J. Blake, first being duly sworn, deposes and says that he is the attorney for GreenCo; 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 GreenCo.

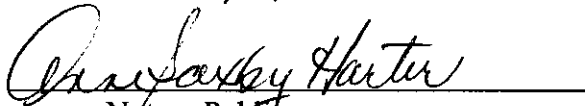
This 22nd day of September, 2008.

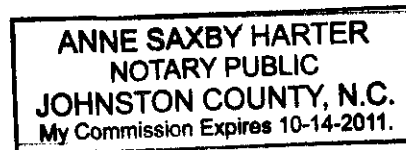

Joseph W. Eason

NORTH CAROLINA

WAKE COUNTY

Sworn to and subscribed before me
This 22nd day of September, 2008.


Notary Public



Anne Saxby Harter
Print Notary Public Name

My Commission Expires: 10/14/2011

CERTIFICATE OF SERVICE

The undersigned attorney for GreenCo Solutions, Inc. hereby certifies that he served the foregoing Motion to Intervene of GreenCo Solutions, Inc. upon the parties of record in this proceeding as follows:

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This 22nd day of September, 2008.

A handwritten signature in black ink, appearing to read "Joseph E. ...", is written over a horizontal line.