

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1287  
DOCKET NO. E-7, SUB 1261**

DOCKET NO. E-2, Sub 1287	)	
	)	
In the Matter of:	)	<b>JOINT MOTION FOR LEAVE TO</b>
Application of Duke Energy Progress,	)	<b>REPLY OF NORTH CAROLINA</b>
LLC for Approval of Smart Saver Solar	)	<b>SUSTAINABLE ENERGY</b>
Energy Efficiency Program	)	<b>ASSOCIATION, SOUTHERN</b>
	)	<b>ALLIANCE FOR CLEAN</b>
DOCKET NO. E-7, SUB 1261	)	<b>ENERGY, AND VOTE SOLAR</b>
	)	
In the Matter of:	)	
Application of Duke Energy Progress,	)	
LLC for Approval of Smart Saver Solar	)	
Energy Efficiency Program	)	

**JOINT MOTION FOR LEAVE TO REPLY**

The North Carolina Sustainable Energy Association (“NCSEA”), Southern Alliance for Clean Energy (“SACE”), and Vote Solar (collectively, the “Joint Intervenors”) by and through counsel, respectfully move the North Carolina Utilities Commission (“Commission”), pursuant to Commission Rule R1-7, to grant this Joint Motion for Leave to Reply. In support of the motion, the Joint Intervenors respectfully show the following:

1. Duke Energy Progress, LLC (“DEC”) and Duke Energy Carolinas, LLC, (“DEP”) (DEC and DEP collectively, “Duke Energy”) filed applications on December 16, 2021 for approval of the Smart Saver Solar Energy Efficiency Program (“Proposal”) in the above-referenced dockets.
2. Pursuant to Commission Rule R8-68(d)(2) and the two extensions of time granted to the Public Staff – North Carolina Utilities Commission (“Public Staff”) and the

North Carolina Attorney General’s Office (“AGO”) respectively, the Public Staff, AGO, and other interest parties filed comments regarding Duke Energy’s Proposal on March 15, 2022.

3. Pursuant to the Commission’s February 25, 2022 Order Granting Second Extension of Time and Commission Rule R8-68(d)(2), Duke Energy has the right to respond to all such comments within 10 days of filing.
4. In its comments filed March 15, 2022, the AGO highlighted the need for an investigation of the benefits of customer-sited generation and the need to take a holistic approach to review of the Proposal while considering the Carbon Plan process and new net energy metering tariffs.
5. Given the AGO’s request to delay issuing an order in these dockets, to which the Public Staff is not opposed, the Joint Intervenors seek leave for all parties to the proceeding to address some of the AGO’s concerns and to highlight any areas of agreement between the Joint Intervenors and the AGO by filing reply comments by March 25, 2022.<sup>1</sup>
6. In its comments filed March 15, 2022, the Public Staff argued that the Program should be denied based on various grounds, including the definition of energy efficiency, the solar rebate program established by N.C. Gen. Stat. § 62-155, free ridership, and other grounds.
7. Given the Public Staff’s extensive comments on the Program, the Joint Intervenors seek leave for all parties to the proceeding to address and reply to the Public Staff’s objections by filing reply comments by March 25, 2022.

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<sup>1</sup> Consistent with Commission Rule R8-68(d)(2), the Joint Intervenors seek the right to respond to parties’ comments within 10 days of the filing thereof.

8. The Joint Intervenors have contacted counsel for the parties to this proceeding and are authorized to represent that the Solar Energy Industries Alliance affirmatively supports the motion, and Duke Energy, the Public Staff, the Attorney General's Office, and the Carolina Industrial Group for Fair Utility Rates II and III do not object to the motion.

WHEREFORE, for all the reasons set forth herein, the Joint Intervenors respectfully request that the Commission grant this motion for leave and grant any such further relief as the Commission deems just and reasonable.

Respectfully submitted, this the 21st day of March, 2022.

/s/ Peter H. Ledford

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*Counsel for the Southern Alliance for  
Clean Energy and Vote Solar*

**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Motion 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 21st day of March, 2022.

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