

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. M-100, SUB 164**

**In the Matter of:** )  
**Consideration of the Federal Funding ) NCSEA’S PETITION TO**  
**Available Under the Infrastructure ) INTERVENE**  
**Investment and Jobs Act )**

**NCSEA’S PETITION TO INTERVENE**

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. NCSEA has been an active participant in dockets pertaining to the programs identified in the Infrastructure Investment and Jobs Act, as identified by the Commission, including but not limited to electric vehicle charging infrastructure (*see*, Docket Nos. E-2, Sub 1197 and E-7, Sub 1195), smart grid investments (*see*, Docket Nos. E-100, Sub 126, E-100, Sub 141, E-100 Sub 147, and E-100, Sub 157), and energy storage demonstration projects (*see*, Docket No. E-2, Sub 1185).

3. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

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  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
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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,

  
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Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the 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 2<sup>nd</sup> day of February 2022.

  
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Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 2 day of February 2022.

[AFFIX SEAL OF NOTARY]

  
\_\_\_\_\_  
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 2<sup>nd</sup> day of February 2022.



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General Counsel  
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