

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1213
DOCKET NO. E-7, SUB 1209**

In the Matter of:)	
Application by Duke Energy Carolinas,)	NCSEA’S PETITION TO
LLC and Duke Energy Progress, LLC for)	INTERVENE
Approval of Proposed Smart Meter)	
Application Pilots)	

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 dockets. 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 Carolinas, LLC and Duke Energy Progress, LLC. Further, NCSEA and its members are keenly interested in customer data energy usage, including that which may be used in Duke’s proposed smart meter usage application.
3. NCSEA is currently an active intervenor in Commission Docket No. E-100, Sub 161, relating to Commission Rules related to electric customer billing data. NCSEA has

also previously been involved in issues involving customer data and customer data access rules before the Commission. *See generally, NCSEA's Initial Comments*, Docket No. E-100, Sub 157 (January 16, 2019); *NCSEA's Post-Hearing Brief*, Docket No. E-7, Sub 1146 (April 27, 2018); *Direct Testimony of Michael Murray on Behalf of North Carolina Sustainable Energy Association*, Docket No. E-7, Sub 1146 (January 23, 2018); *NCSEA's Comments*, Docket No. E-100, Sub 147 (December 19, 2016); *Comments of NCSEA and EDF*, Docket No. E-100, Sub 141 (January 9, 2015); *NCSEA's Comments*, Docket No. E-100, Sub 137 (February 5, 2013).

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

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

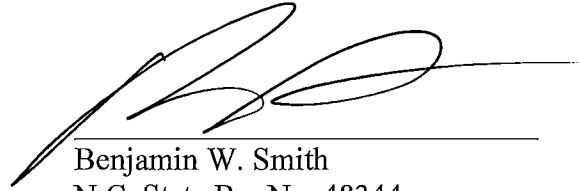
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6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

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
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VERIFICATION

Benjamin W. Smith, 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 10th day of July, 2019.



Benjamin W. Smith

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 10th day of July, 2019.

[AFFIX SEAL OF NOTARY]

Daniel G. Brookshire
Notary Public

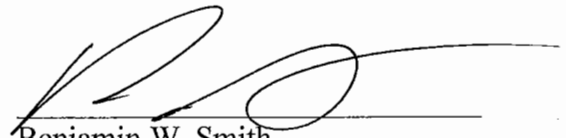
Daniel G. Brookshire
Printed Name of Notary Public
My Commission Expires: 7-2-2022

**Daniel G Brookshire, Notary Public
Orange County, North Carolina
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 10th day of July, 2019.



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