

OFFICIAL COPY

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1105

FILED

MAR 10 2016

Clerk's Office
N.C. Utilities Commission

In the Matter of:)
Application of Duke Energy Carolinas,)
LLC for Approval of Demand-Side)
Management and Energy Efficiency)
Cost Recovery Rider Pursuant to N.C.)
Gen. Stat. § 62-133.9 and Commission)
Rule R8-69)

MOTION OF NCSEA TO INTERVENE

MOTION OF NCSEA 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 moves to intervene in the above-referenced docket. In support of this motion, 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 was a chief proponent of North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS law”), has substantial organizational awareness of the law and its implementation, and has a direct interest in seeing the policies and goals of the REPS law achieved in a manner consistent with the legislative intent. The interest of NCSEA and its members in the REPS law, renewable energy, and energy efficiency

extends to dockets such as this one for a multitude of reasons. NCSEA's interest in cases such as this one has been recognized by the Commission. *See, e.g.*, NCUC Docket No. E-7, Sub 1073 (Vintage 7 rider); NCUC Docket No. E-7, Sub 1050 (Vintage 6 rider); NCUC Docket No. E-7, Sub 1031 (Vintage 5 rider); NCUC Docket No. E-7, Sub 1001 (Vintage 4 rider); NCUC Docket No. E-7, Sub 831 (NCSEA was permitted to intervene where Duke Energy Carolinas, LLC sought approval of Save-a-Watt and its first energy efficiency rider); *see also* NCUC Docket No. E-100, Sub 110 (a pre-REPS complaint brought by NCSEA against Duke Energy Carolinas, LLC to require increased use of energy efficiency).

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 Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

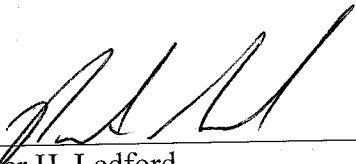
Peter H. Ledford
Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

Michael Youth
Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 118
michael@energync.org

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,

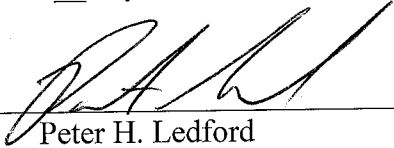


Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing 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 NCSEA.

This the 10 day of March, 2016.

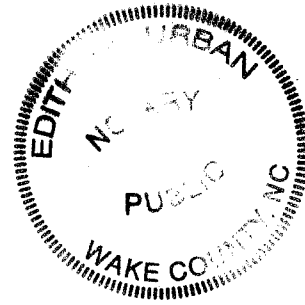


Peter H. Ledford

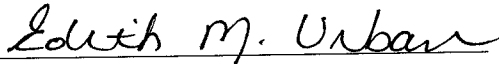
NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 10 day of March, 2016.



[AFFIX SEAL OF NOTARY]



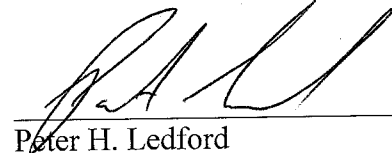
Notary Public

Edith M. Urban
Printed Name of Notary Public
My Commission Expires: 8/1/2017

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 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 March, 2016.



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