

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 170**

In the Matter of:)	
Investigation of Interconnection Issues)	NCSEA’S PETITION TO
Related to Electric Merchant Generating)	INTERVENE
Facilities)	

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. Many of NCSEA’s members develop electric merchant generating facilities, and as such will be directly impacted by the outcome of this proceeding. In addition, NCSEA has been extensively involved in both the Commission’s interconnection standard (Docket No. E-100, Sub 101) and has previously intervened in a proceeding regarding a certificate of public convenience and necessity for an electric merchant generating facility (Docket No. EMP-105, Sub 0).

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
General Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
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Regulatory Counsel for NCSEA
4800 Six Forks Road
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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,



Peter H. Ledford
N.C. State Bar No. 42999
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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 29th day of September 2020.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY


Sworn to and subscribed before me,

this the 29th day of September 2020.

[AFFIX SEAL OF NOTARY]



Notary Public



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 29th day of September 2020.



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