

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1159  
DOCKET NO. E-7, SUB 1156**

<b>In the Matter of:</b>	)	<b>NCSEA’S PETITION TO</b>
<b>Petition for Approval of Competitive</b>	)	<b>INTERVENE</b>
<b>Procurement of Renewable Energy</b>	)	
<b>Program to Implement N.C. Gen.</b>	)	
<b>Stat. § 62-110.8</b>	)	

**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 was actively involved in the negotiations that led to House Bill 589 and Session Law 2017-192, which adopted G.S. 62-110.8. NCSEA was also granted a petition to intervene and filed comments, reply comments, and supplemental reply comments in Docket No. E-100, Sub 150 which established the rules governing this competitive procurement of renewable energy program. In addition, many of NCSEA’s members are developers of renewable energy projects that have substantial interest in the competitive

procurement of renewable energy program filed in this proceeding and established by G.S. 62-110.8. As such, NCSEA has an interest in ensuring that the statute is implemented in accordance with the intent of the legislature.

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  
(919) 832-7601 Ext. 107  
peter@energync.org

Benjamin W. Smith  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 111  
ben@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.

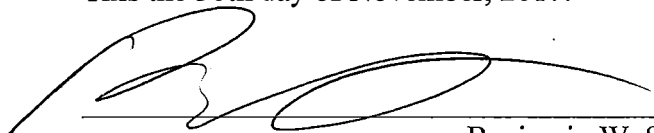
Respectfully submitted,

          /s/ Benjamin W. Smith            
Benjamin W. Smith  
N.C. State Bar No. 48344  
Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 111  
ben@energync.org

VERIFICATION

Benjamin H. 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 30th day of November, 2017.



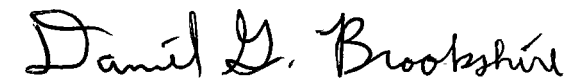
Benjamin W. Smith

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 30th day of November, 2017.

[AFFIX SEAL OF NOTARY]



Notary Public

**Daniel G Brookshire, Notary Public  
Orange County, North Carolina  
My Commission Expires 7/2/2022**



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 1st day of December, 2017.

/s/ Benjamin W. Smith  
Benjamin W. Smith  
N.C. State Bar No. 48344  
Counsel  
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4800 Six Forks Road  
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