

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1089**

In the Matter of:)
Application of Duke Energy Progress,)
LLC for a Certificate of Public)
Convenience and Necessity to Construct a)
752 Megawatt Natural Gas-Fueled)
Electric Generation Facility in Buncombe)
County Near the City of Asheville)

**Petition of NCSEA
to Intervene**

FILED
JAN 20 2016
Clerk's Office
N.C. Utilities Commission

Petition 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. Many of NCSEA's members are customers of Duke Energy Progress and use electric power supplied by Duke Energy Progress in their homes and businesses. Some of these members are potential owners and operators of small distributed generation systems that are interconnected with the Duke Energy Progress system.

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:


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Michael Youth
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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,

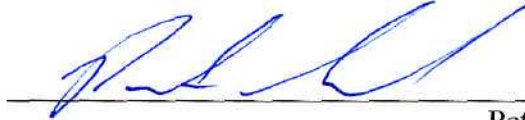


Peter H. Ledford
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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing 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 20th day of January, 2016.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

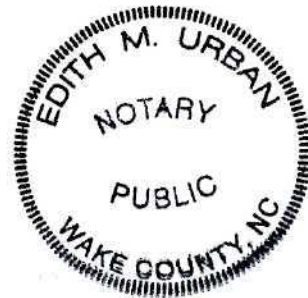
Sworn to and subscribed before me,

this the 20 day of January, 2016.

[AFFIX SEAL OF NOTARY]

Edith M. Urban
Notary Public

Edith M. Urban
Printed Name of Notary Public
My Commission Expires: 8/01/2017



CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing 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 20th day of January, 2016.



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