

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-7, SUB 1190**

**In the Matter of: )  
Application of Duke Energy )  
Carolinas, LLC Pursuant to G.S. 62- )  
133.2 and NCUC Rule R8-55 )  
Relating to Fuel and Fuel-Related )  
Charge Adjustments for Electric )  
Utilities )**

**PETITION OF NCSEA TO  
INTERVENE**

**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 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 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. First and foremost, hearings

under Commission Rule R8-55 involve costs for the purchase of power from renewable energy facilities. See Rule R8-55(a)(6). But, even if no such costs were at issue, a utility's generation facility must be viewed comprehensively – its non-renewable fuel and fuel-related costs inevitably impact the renewable component of its generation portfolio as well as consideration of demand-side management measures – and therefore, NCSEA and its members would still have an interest in Duke Energy Carolina, LLC's ("DEC") non-renewable fuel and fuel-related costs. The Commission has recognized NCSEA's interest in such proceedings. *See, e.g.*, NCUC Docket No. E-7, Sub 1163; NCUC Docket No. E-7, Sub 1129; NCUC Docket No. E-7, Sub 1104; NCUC Docket No. E-7, Sub 1072; NCUC Docket No. E 7, Sub 1051; NCUC Docket No. E-7, Sub 1033.

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

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

VERIFICATION

Benjamin 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 14<sup>th</sup> day of March, 2019.


  
\_\_\_\_\_  
Benjamin Smith

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 14<sup>th</sup> day of March, 2019.

[AFFIX SEAL OF NOTARY]

  
\_\_\_\_\_  
Notary Public

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

Daniel G. Brookshire  
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 19<sup>th</sup> day of March, 2019.

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