

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 166**

In the Matter of:)
Rulemaking Proceeding to Amend Filing) **PETITION OF NCSEA TO**
Requirements for Application for) **INTERVENE**
Certificate of Public Convenience and)
Necessity Pursuant to Commission Rules)
R8-64 and R8-71(k))

PETITION OF NCSEA TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, and the Commission’s May 12, 2020 *Order Initiating Rulemaking and Requesting Comments* in the above-referenced docket, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the 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.

3. NCSEA has frequently appeared before this Commission as an intervenor in avoided cost dockets. *See, e.g.*, Commission Docket No. E-100, Sub 158; Commission Docket No. E-100, Sub 148; Commission Docket No. E-100, Sub 140; Commission Docket No. E-100, Sub 136; Commission Docket No. E-100, Sub 127; and Commission Docket No. E-100, Sub 117.

4. Furthermore, NCSEA has regularly appeared as an intervenor in matters before this Commission related to the incorporation of renewable energy resources to the grid, including notably solar and solar+storage resources. NCSEA engages on PURPA-related matters, both in front of the Commission and in other venues, and has decades of regulatory experience advocating on the subject matter related thereto.

4. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

5. NCSEA's address is 4800 Six Forks Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

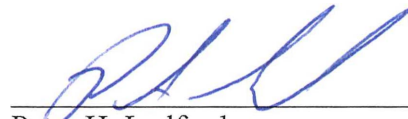
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6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted this the 28th day of May, 2020.

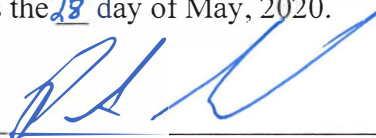


Peter H. Ledford
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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing 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 28th day of May, 2020.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 28 day of May, 2020.

[AFFIX SEAL OF NOTARY]



Notary Public




Victoria Prince Somol
Printed Name of Notary Public
My Commission Expires: 5-22-2022

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 28th day of May, 2020.



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