

FILED

APR 05 2016

Clerk's Office
N.C. Utilities Commission

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-22, SUB 532

In the Matter of:)
Application of Dominion North Carolina)
Power for Adjustment of Rates and)
Charges Applicable to Electric Service in)
North Carolina)
)

MOTION OF NCSEA TO
INTERVENE

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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. The interest of NCSEA and its members in renewable energy and energy efficiency extends to dockets such as this one for a multitude of reasons. NCSEA's members are not only customers of electric service providers, including Dominion North Carolina Power, they are also proponents of renewables-based generation and energy efficiency. As such, they have a strong interest in the rates and charges for electricity in this State. NCSEA's interest in cases such as this one has been recognized by the Commission. *See, e.g.*, NCUC

Docket No. E-7, Sub 989 (NCSEA was permitted to intervene in the 2011 Duke Energy Carolinas, LLC base rate case); NCUC Docket No. E-2, Sub 1023 (Progress Energy Carolinas, Inc.'s 2012 base rate case); NCUC Docket No. E-22, Sub 479 (NCSEA was permitted to intervene in the 2012 Dominion North Carolina Power base rate case); NCUC Docket No. E-7, Sub 1026 (NCSEA was permitted to intervene in the 2013 Duke Energy Carolinas, LLC base rate case).

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

Michael Youth
Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 118
michael@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,

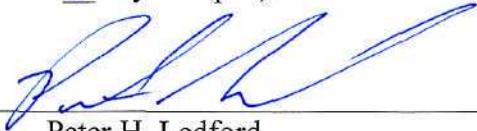


Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

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 5 day of April, 2016.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

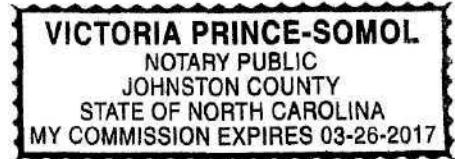
Sworn to and subscribed before me,

this the 5 day of April, 2016.

[AFFIX SEAL OF NOTARY]



Notary Public



Victoria Prince-Somol
Printed Name of Notary Public
My Commission Expires: 3-26-2017

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Motion 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 5 day of April, 2016.



Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org