

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1170  
DOCKET NO. E-7, SUB 1169**

<b>In the Matter of:</b>	)	
<b>Petition for Approval of Green Source</b>	)	<b>NCSEA’S PETITION TO</b>
<b>Advantage Program and Rider GSA to</b>	)	<b>INTERVENE</b>
<b>Implement N.C. Gen. Stat. § 62-159.2</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. 62-159.2. NCSEA’s membership includes developers of solar energy facilities that would be eligible to supply energy under the provisions of G.S. 62-159.2. Further, NCSEA’s membership includes large nonresidential customers that would be eligible to receive service pursuant to the provisions of G.S. 62-159.2. The interests of NCSEA’s members are not represented by any other party

to the proceeding. 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  
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/ Peter H. Ledford  
Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
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 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 24th day of January, 2018.

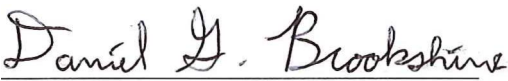
  
\_\_\_\_\_  
Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

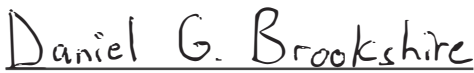
Sworn to and subscribed before me,

this the 24th day of January, 2018.

[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 24th day of January, 2017.

/s/ Peter H. Ledford  
Peter H. Ledford  
N.C. State Bar No. 42999  
General Counsel  
NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
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