BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 180

In the Matter of:
Investigation of Proposed Net Metering Policy Changes

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.


3. On January 10, 2022, the Commission issued its Order Requesting Comments regarding Duke’s application in the above-captioned docket.
4. NCSEA has been a long-time proponent of net metering. See, Order Initiating Investigation and Requesting Comments, Docket No. E-100, Sub 83 (November 18, 1998). Furthermore, NCSEA was an active participant in the legislative processes that led to the passage of both S.L. 2017-192, which adopted N.C. Gen. Stat. § 62-126.4, and S.L. 2021-165, better known as House Bill 951.

5. NCSEA is a signatory to the Memorandum of Understanding that was attached to Duke’s Application.

6. NCSEA has intervened in each of Docket Nos. E-7, Sub 1214, E-2, Sub 1219, and E-2, Sub 1076 where Duke filed its Application and Docket No. E-100, Sub 83.

7. NCSEA’s membership includes residential rooftop solar installers, adopters, and potential adopters who work or live in Duke’s service territory.

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

9. 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                  Benjamin W. Smith
   Counsel for NCSEA                Counsel for NCSEA
   4800 Six Forks Road              4800 Six Forks Road
   Suite 300                        Suite 300
   Raleigh, NC 27609                Raleigh, NC 27609
   (919) 832-7601 Ext. 107          (919) 832-7601 Ext. 111
   peter@energync.org               ben@energync.org

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

Respectfully submitted,

[Signature]

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 13th day of January 2022.

[Signature]

Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 13th day of January 2022.

[Signature]

Daniel G. Brookshire
Notary Public

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 13th day of January 2022.

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