

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 178

In the Matter of: )  
Rulemaking Proceeding to Implement ) NCSEA’S PETITION TO  
Performance-Based Regulation of Electric ) INTERVENE  
Utilities )

NCSEA’S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19 and the Commission’s October 14, 2021 *Order Requesting Comments and Proposed Rules*, 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 actively involved in the development of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and goals of the session law implemented in a manner consistent with legislative intent.
3. NCSEA has frequently appeared in electric utility rate cases before the Commission. *See, e.g.*, Docket No. E-7, Sub 989 (NCSEA was permitted to intervene in the 2011 Duke Energy Carolinas, LLC general rate case); Docket No. E-2, Sub 1023

(Progress Energy Carolinas, Inc.'s 2012-13 general rate case); Docket No. E-7, Sub 1026 (Duke Energy Carolinas, LLC 2013 general rate case); Docket No. E-22 Sub 532 (Dominion North Carolina Power's 2016 general rate case); Docket No. E-2, Sub 1142 (Duke Energy Progress, LLC's 2017 general rate case); Docket No. E-7, Sub 1146 (Duke Energy Carolinas, LLC's 2017 general rate case); Docket No. E-7, Sub 1214 (Duke Energy Carolinas, LLC's 2019 general rate case); Docket No. E-2, Sub 1219 (Duke Energy Progress, LLC's 2019 general rate case).

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:

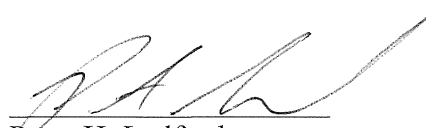
Peter H. Ledford  
General Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@energync.org

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

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 1st day of November 2021.



Peter H. Ledford  
General 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 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.

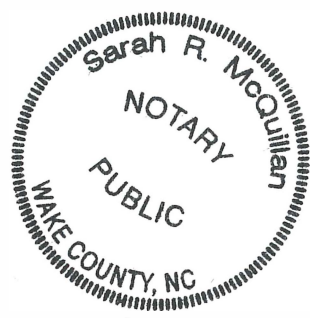
This the 15<sup>th</sup> day of November 2021.

  
Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 1 day of November 2021.



[AFFIX SEAL OF NOTARY]

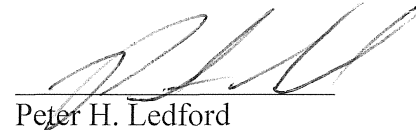
  
Notary Public

Sarah R. McQuilken  
Printed Name of Notary Public  
My Commission Expires: 5/30/2026

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 1st day of November 2021.



Peter H. Ledford  
General 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