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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1109

FILED

JUN 28 2016

Clerk's Office
N.C. Utilities Commission

In the Matter of:)
Application of Duke Energy Progress,)
Inc. for Approval of Renewable Energy)
and Energy Efficiency Portfolio Standard)
(REPS) Compliance Report and Cost)
Recovery Rider Pursuant to N.C. Gen.)
Stat. 62-133.8 and Commission)
Rule R8-67)

PETITION 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 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. The Commission's ruling in this docket will have broad implications for both NCSEA and its members. NCSEA was a chief proponent of North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard ("REPS") and has a direct and substantial interest in its implementation to assure that the policies and goals of the REPS law are achieved in a manner consistent with the legislative intent. Additionally, some of NCSEA's

members participate in utility efficiency programs, generate renewable energy certificates used by Duke Energy Progress, Inc. and others to meet their obligations under the REPS law, and/or complete energy efficiency projects eligible for REPS compliance; as such, these members have an interest in the REPS compliance efforts of electric power suppliers.

3. NCSEA has frequently appeared before this Commission as an intervenor, in dockets concerning applications for cost recovery under North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard. *See, e.g.*, Commission Docket No. E-2, Sub 1071; Commission Docket No. E-2, Sub 1043; Commission Docket No. E-2, Sub 1032; Commission Docket No. E-2, Sub 1020; Commission Docket No. E-2, Sub 1000; Commission Docket No. E-2, Sub 974; and Commission Docket No. E-2, Sub 948.

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:

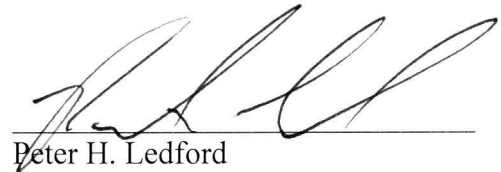
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6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

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

Respectfully submitted,

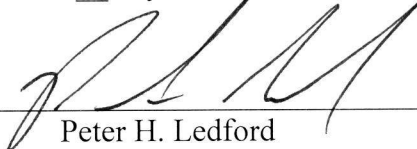
A handwritten signature in black ink, appearing to read 'P. Ledford', is written over a horizontal line.

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 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 28 day of June, 2016.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 28 day of June, 2016.

[AFFIX SEAL OF NOTARY]

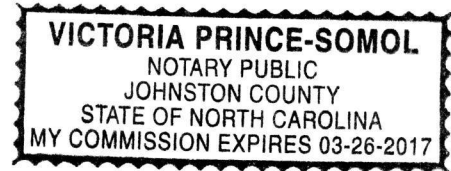


Notary Public

Victoria Prince Somol

Printed Name of Notary Public

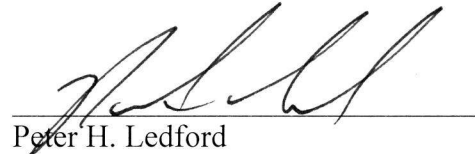
My Commission Expires: 3-26-2017



CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing 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 28 day of June, 2016.



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