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**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 101A**

FILED
FEB 01 2016
Clerk's Office
N.C. Utilities Commission

In the Matter of:)	
Quarterly Interconnection Queue)	MOTION OF NCSEA TO
Performance Report and Quarterly)	INTERVENE
Interconnection Queue Status Report)	

MOTION OF NCSEA 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 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. By order dated March 22, 2005 in Docket No. E-100, Sub 101, the Commission required utilities to file reports detailing information on (1) interconnection requests, and (2) any claims for personal injury or property damage caused by the interconnection or operation of a customer generator. *Order Approving, In Part, Proposed Interconnection Standard*, Docket No. E-100, Sub 101 (March 22, 2005). NCSEA is a party to Docket No. E-100, Sub 101. *See, Order Granting Petition to Intervene*, Docket No. E-100, Sub 101 (June 25, 2004).

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 Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

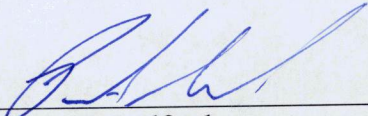
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5. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

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

Respectfully submitted,

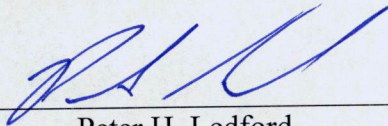


Peter H. Ledford
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VERIFICATION

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 1st day of February, 2016.



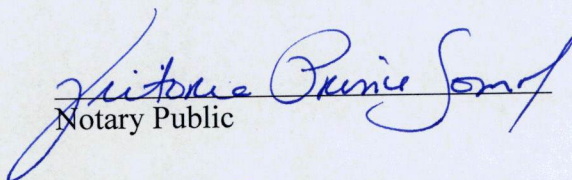
Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 1 day of February, 2016.

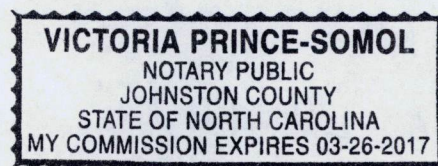
[AFFIX SEAL OF NOTARY]



Notary Public

Victoria Prince Somol
Printed Name of Notary Public

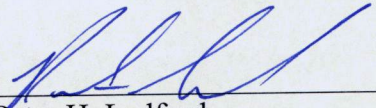
My Commission Expires: 3-26-2017



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 14 day of February, 2016.



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