

14 February 2013

To: Chief Clerk Gail Mount

The North Carolina Utilities Commission

4325 Mail Service Center Raleigh, NC 27699-4325 FILED

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Clerk's Office N.C Utilities Commission

From: The North Carolina Sustainable Energy Association

P.O. Box 6465 Raleigh, NC 27628

Re: Progress Energy Carolinas, Inc.'s Request to Revise Residential SunSense Rider SSR-1

(Docket No. E-2, Sub 979)

Honorable Clerk and Commissioners:

I serve as counsel and policy director for the North Carolina Sustainable Energy Association ("NCSEA"). NCSEA is a 501(c)3 nonprofit organization whose members are individuals, businesses, governments and non-profits interested in North Carolina's sustainable energy future. For 34 years, NCSEA has helped shape North Carolina's commitment to renewable energy, energy efficiency, high-performance building, and a robust clean energy economy in communities all across our state.

NCSEA is aware that Progress Energy Carolinas, Inc.'s ("PEC") request to revise the Residential SunSense Rider is set to be heard at the 18 February 2013 Staff Conference. NCSEA has engaged its members seeking feedback on PEC's request. While the feedback has not been unanimous, NCSEA's members generally understand:

- the motivation for the request to reduce the up-front rebate from \$1/watt to \$0.50/watt AC installed. At the same time, these members desire a delayed implementation date to enable them to incorporate the change into their business planning. NCSEA appreciates and supports the 30 March 2013 implementation date being proposed by PEC and the Public Staff.
- the motivation for incorporating the NABCEP certification requirement beginning 31 October 2013. NCSEA's members are generally supportive of the requirement, but want to ensure that it is not unduly burdensome. NCSEA therefore supports the NABCEP requirement so long as it is implemented to require that the system be designed and installed under the supervision of a NABCEP-certified PV Installation Professional. It is NCSEA's understanding that PEC intends to implement the requirement in this manner.

I am submitting this letter but will not be present at the Staff Conference; I will be at a memorial service in Florida.

Sincerely,

Michael D. Youth

Counsel & Policy Director