## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. SP-100, SUB 32

In the Matter of:	PETITION OF NCSEA TO
Request for a Declaratory Ruling by )	INTERVENE
Col. Francis X. De Luca USMCR )	
(RET)	

## PETITION 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 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. Many of NCSEA's members are developers and owners of qualifying facilities that would be impacted by the Commission's determination in the above-referenced docket.
- 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 Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

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

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,

/s/ Peter H. Ledford
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
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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 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 **23** day of May, 2017.

Peter H. Ledford

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me,

this the 25° day of May, 2017.

Jessiea Seifert

Printed Name of Notary Public

My Commission Expires: 8-4.18

AFFIX SEMPOE NOTARY

## **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 23rd day of May, 2017.

/s/ Peter H. Ledford
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