

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. SP-100 SUB 31

In the Matter of:)
Petition by North Carolina Waste Awareness) MOTION TO INTERVENE
and Reduction Network for a Declaratory)
Ruling Regarding Solar Facility Financing)
Arrangements and Status as a Public Utility)

NCSEA'S MOTION TO INTERVENE

Pursuant to North Carolina Utilities Commission ("Commission") Rules R1-5, R1-7, and R1-19, and the Commission's 30 September 2015 *Order Requesting Comments* in the above-reference docket, the North Carolina Sustainable Energy Association ("NCSEA") hereby moves to intervene in the 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. NCSEA has an interest in North Carolina Waste Awareness and Reduction Network's petition in this docket.
3. NCSEA does not plan to file initial comments in this docket; however, NCSEA may wish to file reply comments.
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 Ledford
Regulatory 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 Ledford
Regulatory 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 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 30th day of October, 2015.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 30 day of October, 2015.

[AFFIX SEAL OF NOTARY]

Edith M. Urban
Notary Public

Edith M. Urban
Printed Name of Notary Public
My Commission Expires: 8/1/2017



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 30th day of October, 2015.

/s/ Peter H. Ledford
Peter H. Ledford
Regulatory Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
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Peter H. Ledford

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WAKE COUNTY

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