BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-2, SUB 1076

In the Matter of:)	
Notice of Duke Energy Progress Conversion	ı)	NCSEA'S PETITION TO
to Limited Liability Company)	INTERVENE

NCSEA'S PETITION 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. On November 29, 2021, Duke Energy Progress, LLC ("DEP") filed its *Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance with G.S. § 62-126.4 and House Bill 951* ("Application") in the above-captioned docket.
- 3. NCSEA has been a long-time proponent of net metering. *See*, *Order Initiating Investigation and Requesting Comments*, Docket No. E-100, Sub 83 (November 18, 1998). Furthermore, NCSEA was an active participant in the legislative processes that led to the

passage of both S.L. 2017-192, which adopted N.C. Gen. Stat. § 62-126.4, and S.L. 2021-165, better known as House Bill 951.

- 4. NCSEA is a signatory to the Memorandum of Understanding that was attached to DEP's Application.
- 5. NCSEA's membership includes residential rooftop solar installers, adopters, and potential adopters who work or live in DEP's service territory.
- 6. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.
- 7. 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

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8. 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,

Per II. Ledford

N.C. State Bar No. 42999

General Counsel

NCSEA

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 2014 day of December 2021.

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me,

this the 70 day of December 2021.

[AFFIX SEAL OF NOTARY]

Notary Public

Printed Name of Notary Public
My Commission Expires: 5/30/2020

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 Zouday of December 2021.

Peter H. Ledford

N.C. State Bar No. 42999

General Counsel

NCSEA

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