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January 27, 2014

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HAND DELIVERED

Ms. Gail Mount, Chief Clerk North Carolina Utilities Commission 430 N. Salisbury Street Raleigh, NC 27603

RE:

Invenergy Wind Development LLC, and Invenergy Solar Development LLC Petition to Intervene Docket Nos. E-100, Sub 137 and E-100, Sub 139

Dear Ms. Mount:

Please find attached an electronic submission of the Petition to Intervene by Invenergy Wind Development LLC and Invenergy Solar Development LLC in the above-referenced NCUC Dockets.

If you have any questions or comments regarding this filing, please do not hesitate to call me. Thank you in advance for your assistance with this filing.

Sincerely,

M. Gray Sty

cc:

All parties of record

RTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 137 DOCKET NO. E-100, SUB 139

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 137	
In the Matter of	PETITION TO INTERVENE
2013 Updated Integrated Resource	by
Plans)	INVENERGY WIND
And Related 2013 REPs Compliance	DEVELOPMENT LLC
Plans)	and
)	INVENERGY SOLAR
DOCKET NO. E-100, SUB 139	DEVELOPMENT LLC
In the Matter of	
2013 REPs Compliance Plans and	
2012 Compliance Reports	

NOW COME Invenergy Wind Development LLC and Invenergy Solar Development LLC (collectively "Invenergy" or the "Petitioners"), by and through their undersigned attorney, and respectfully request that the North Carolina Utilities Commission (the "Commission") allow them to intervene in the above-referenced dockets, pursuant to N.C.G.S. § 62-72 and Rules R1-7 and R1-19 of the Rules and Regulations of the Commission, and to grant them leave to participate fully as parties in these dockets. In support of this Petition, Petitioners show the Commission the following:

1. Petitioners are both limited liability companies existing under the laws of the State of Delaware with their principal office located at One South Wacker Drive, Suite 1900, Chicago, IL 60606.

- 2. Invenergy Wind Development LLC is the largest independent wind power company in North America. Invenergy Wind Development LLC and its affiliates have a portfolio of 4,215 MWs in wind generation facilities. It has announced its intentions, through its affiliate, Pantego Wind Energy LLC, to develop a wind-powered electric generating facility of up to 80 MW in Beaufort County, North Carolina. A Certificate of Public Convenience and Necessity for this facility was issued by Order of the Commission in Docket EMP-61, Sub 0 on March 8, 2012. The Integrated Resource Plans and Renewable Energy and Energy Efficiency Portfolio Standard ("REPs") Compliance Plans of the retail electric utilities in North Carolina will affect the market for wind energy resources in North Carolina in which Invenergy Wind Development LLC or its affiliates intend to participate, and the economics of which will affect this Petitioner's capital investment decisions.
- 3. Invenergy Solar Development LLC is active in the solar photovoltaic ("PV") market, and, together with its affiliates, has completed over 40 MW of PV projects elsewhere in North America. It selectively pursues solar projects in areas, such as in North Carolina, where already it is developing other projects. It has secured property rights for, and is in the process of evaluating the feasibility of, three separate solar PV electric generating facilities in North Carolina. The Integrated Resource Plans and REPs Compliance Plans of the retail electric utilities in North Carolina will affect the market for solar PV renewable energy resources in North Carolina in which Invenergy Solar Development LLC or its affiliates intend to participate, and the economics of which will affect this Petitioner's capital investment decisions.

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4. All notice, pleadings, and other documents related to this proceeding should be directed to the Petitioners as follows:

M. Gray Styers, Jr., Esq. Styers, Kemerait & Mitchell, PLLC 1101 Haynes Street, Suite 101-C Raleigh, NC 27604 Telephone: 919/600-6273

E-mail: gstyers@styerskemerait.com

Invenergy Wind Development LLC
Invenergy Solar Development LLC
C/o Jason Minalga
Manager, Commercial Analytics and Regulatory Affairs
One South Wacker Drive, Suite 1900
Chicago, IL 60606
E-mail: jminalga@invenergyllc.com

- 4. Petitioners have a valid and direct interest in these matters and no other party can adequately represent Petitioner's interests in these dockets. Specifically, the Commission's decisions in these dockets may directly affect the markets for energy and capacity generated by renewable resources in which Petitioners intend to participate, and the economics of which will affect Petitioners' capital investment decisions.
- 5. Petitioners participation in this docket will not delay the proceedings or unduly burden the process of deciding the issues in these dockets.
- 6. Petitioners agree to accept electronic service of all filings in these dockets.
- 7. Petitioners ask that the Commission to make them a full party to these proceedings with the right to file Comments and Reply Comments, to call witnesses, cross-examine other parties' witnesses, and be heard on all matters relative to the issues raised in these proceedings.

WHEREFORE, Petitioners respectfully request that the Commission enter an Order allowing Petitioners to intervene and participate fully as parties in these dockets.

This the 27 Hday of January 2014.

STYERS, KEMERAIT & MITCHELL, PLLC

M. Gray Styers. Jr.

State Bar No. 16844

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STATE OF ILLINOIS

COUNTY OF ___COOK__

VERIFICATION

The undersigned, being first duly sworn, deposes and says that he is the Manager, Commercial Analytics and Regulatory Affairs of Invenergy Solar Development LLC and Invenergy Wind Development LLC; that he has read the foregoing Petition to Intervene; that to his personal knowledge, the matters and statements contained therein are true, except as to those matters or statements made upon 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 the Petitioners.

This the 24 day of January 2014.

Jason Minalga

Sworn to and subscribed before me this 24 day of January 2014.

Notary Public

My Commission Expires: 2/29/2016

(SEAL)

OFFICIAL SEAL HANNAH HERTLEIN NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:02/29/18

(SK012253.DOC 2)

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing Petition to Intervene by Invenergy Solar

Development LLC and Invenergy Wind Development LLC has been served upon each of
the parties of record in this proceeding this day by hand delivery, electronic mail or by
depositing copies of same in a depository under the exclusive care and custody of the
United States Postal Service in postage prepaid envelopes.

This $\frac{27}{4}$ day of January 2014.

M. Gray Styers, Jr., Esq.

Styers, Kemerait & Mitchell, PLLC

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