BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 170

In the Matter of: )
Investigation of Interconnection Issues ) NCSEA’S PETITION TO
Related to Electric Merchant Generating ) INTERVENE
Facilities )

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. Many of NCSEA’s members develop electric merchant generating facilities, and as such will be directly impacted by the outcome of this proceeding. In addition, NCSEA has been extensively involved in both the Commission’s interconnection standard (Docket No. E-100, Sub 101) and has previously intervened in a proceeding regarding a certificate of public convenience and necessity for an electric merchant generating facility (Docket No. EMP-105, Sub 0).
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  
   General Counsel for NCSEA  
   4800 Six Forks Road  
   Suite 300  
   Raleigh, NC 27609  
   (919) 832-7601 Ext. 107  
   peter@energync.org

   Benjamin W. Smith  
   Regulatory Counsel for NCSEA  
   4800 Six Forks Road  
   Suite 300  
   Raleigh, NC 27609  
   (919) 832-7601 Ext. 111  
   ben@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,

   [Signature]

   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  
   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 29th day of September 2020.

[Signature]

Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 29th day of September 2020.

[Signature]

Daniel G. Brookshire
Notary Public

[Printed Name of Notary Public]
My Commission Expires: 7-2-2022
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 29th day of September 2020.

Peter H. Ledford
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