

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1206

In the Matter of:)
Application of Duke Energy Progress,)
LLC for Approval of Demand-Side)
Management and Energy Efficiency)
Cost Recovery Rider Pursuant to N.C.)
Gen. Stat. § 62-133.9 and Commission)
Rule R8-69)

PETITION TO INTERVENE

PURSUANT TO Commission Rule R1-19, the North Carolina Justice Center (“NCJC”), the Southern Alliance for Clean Energy (“SACE”), and the North Carolina Housing Coalition (“NCHC”) (collectively, “Petitioners”), through counsel, file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. On June 11, 2019, Duke Energy Progress, LLC (“DEP”) filed an application in the present docket for approval of its demand-side management (“DSM”) and energy efficiency (“EE”) cost recovery rider for 2019 (“Rider 11”). N.C. Gen. Stat. § 62-133.9(d) authorizes the Commission to approve an annual rider to the rates of an electric public utility for the recovery of all reasonable and prudent costs of new DSM and EE programs, as well as incentives. The Commission approved the existing cost recovery and incentive mechanism for DEP’s DSM and EE programs in Docket No. E-2, Sub 931. Commission Rule R8-69(b) provides for an annual proceeding in which the Commission reviews each electric public utility’s DSM/EE rider application.

2. The North Carolina Justice Center (“NC Justice Center”) is a nonprofit research and advocacy organization whose mission is to eliminate poverty in North

Carolina by ensuring that every household in the state has access to the resources, services and fair treatment it needs to achieve economic security. The NC Justice Center has offices at 224 S. Dawson Street, Raleigh, North Carolina 27601.

3. The NC Justice Center has previously intervened on behalf of low-income North Carolinians in proceedings before the Commission, and most recently intervened in Duke Energy Carolinas, LLC's ("DEC") DSM/EE rider proceeding in Docket No. E-7, Sub 1192.

4. The NC Justice Center and the low-income consumers whose interests it represents have a direct and substantial interest in this proceeding. Many of the low-income consumers represented by the NC Justice Center are customers of DEP and are therefore subject to the direct impacts of DEP's DSM/EE rider. The NC Justice Center seeks to intervene in this proceeding in order to ensure that its interests in promoting energy efficiency programs that help lift the energy burden borne by low-income households are represented.

5. Southern Alliance for Clean Energy ("SACE") is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

6. SACE frequently appears before the Commission as an intervenor in DSM/EE rider proceedings, including in Docket No. E-2, Sub 1019, Docket No. E-2, Sub 1030, Docket No. E-2, Sub 1044, Docket No. E-2, Sub 1070, Docket No. E-2, Sub 1108,

and Docket No. E-2, Sub 1174. SACE also participated actively in Docket No. E-2, Sub 931 and was a party to the DSM/EE Mechanism approved by the Commission in that docket.

7. SACE and its members have a direct and substantial interest in this proceeding. SACE has members who are customers of DEP and are therefore subject to the direct impacts of DEP's DSM/EE rider. SACE seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy savings through cost-effective DSM and EE are represented. SACE is also interested in ensuring that DEP's DSM and EE programs are delivering results, and that the costs and incentives to be recovered via the rider are based on measured and verified energy savings.

8. The North Carolina Housing Coalition ("NC Housing Coalition") is a nonprofit membership organization with the goal of ensuring that every North Carolinian has access to safe, decent, and affordable housing. The NC Housing Coalition works with its members to reduce the energy burdens faced by low-income residents. In addition, as part of its efforts to improve access to affordable housing for low-income individuals, the NC Housing Coalition has advocated for fair and affordable utility rates and charges. The principal address of the NC Housing Coalition is 5800 Faringdon Place, Raleigh, North Carolina, 27609.

9. The NC Housing Coalition has appeared before the Commission as an intervenor in a prior DEP DSM/EE rider proceeding in Docket No. E-2, Sub 1174 and has previously intervened in Commission dockets, most recently in the rate cases filed by DEP and DEC in Docket numbers E-2, Sub 1142 and E-7, Sub 1146.

10. NC Housing Coalition and its members have a direct and substantial interest in this proceeding. NC Housing Coalition has members who are customers of DEP and are therefore subject to the direct impacts of DEP's DSM/EE rider. NC Housing Coalition seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy savings through cost-effective DSM and EE are represented.

11. The attorneys for the NC Justice Center, SACE, and NC Housing Coalition to whom all correspondence and filings in this docket should be addressed are:

David Neal
Gudrun Thompson
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601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516
919-967-1450

Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to dneal@selcnc.org and gthompson@selcnc.org.

WHEREFORE, the NC Justice Center, SACE, and NC Housing Coalition request that they be allowed to intervene in this docket.

Respectfully submitted this the 12th day of July, 2019.

s/ David Neal

David Neal

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VERIFICATION

I, David Neal, verify that the contents of the foregoing Petition to Intervene are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of North Carolina Justice Center, the Southern Alliance for Clean Energy, and the North Carolina Housing Coalition.


David Neal

Date: July 12, 2019

Durham County, North Carolina

Sworn to and subscribed before me this day by David Neal.

This the 12th day of July, 2019


Signature

Mindy D. Campbell, Notary Public

My commission expires: January 24, 2022



CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing Petition to Intervene either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 12th day of July, 2019.

s/ David Neal
David Neal

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