

**BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION**

DOCKET NO. E-100, SUB 165

In the Matter of)	
2020 Biennial Integrated Resource Plans and)	PETITION TO INTERVENE
Related 2020 REPS Compliance Plans)	OF VOTE SOLAR
)	

Pursuant to Rules R1-5, R1-7, and R1-19 of the rules and regulations of the North Carolina Utilities Commission (“Commission”), Vote Solar petitions to intervene in the above-captioned docket. Vote Solar states the following grounds in support:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar is not a trade organization, nor does it have corporate members. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 80,000 members nationally, including members located within the service territories of Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”).

2. The name and principal business address of Petitioner:

Vote Solar
360 22nd St., #730
Oakland, CA 94612

3. Pursuant to Rule R1-22 of the Commission's Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed to practice law in North Carolina:

Thadeus B. Culley
N.C. State Bar No. 47001
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

4. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket be directed to Vote Solar's counsel of record.

5. Vote Solar has an interest in the subject matter of this proceeding. The 2020 Biennial Integrated Resource Plans (IRPs) for DEC and DEP will have profound implications for the energy policy landscape in North Carolina as state and national leaders pivot to address the climate crisis. Moreover, Vote Solar has an interest exploring and emphasizing the opportunities for distributed energy resources to play a greater part in satisfying Duke Energy Corporation's stated corporate carbon-emission reduction and climate goals.

6. Vote Solar will contribute to the record of this docket by, among other things, providing insight and experience on how DEC's and DEP's IRPs compare to national trends and how over-reliance on fossil-fired generation exposes current and future ratepayers to material economic and regulatory climate-related risks.

7. No other party will adequately represent Vote Solar's unique interest in this case.

WHEREFORE, Vote Solar respectfully requests that the Commission grant its request to intervene in this proceeding and to participate fully as a party in order to protect its unique interest in this case.

Respectfully submitted this 2nd day of September, 2020.

/s/

Thadeus B. Culley
N.C. State Bar No. 47001
Sr. Regional Director and
Regulatory Counsel, Southeast
Vote Solar
1911 Ephesus Church Road
Chapel Hill, NC 27517
Telephone: (504) 616-0181
Email: thad@votesolar.org

VERIFICATION

Thadeus B. Culley, first being duly sworn, deposes and says that he is the attorney for Vote Solar; 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 Vote Solar.

This the 2nd day of September, 2020.



Thadeus B. Culley

NORTH CAROLINA
ORANGE COUNTY

Sworn to and subscribed before me,

This the 2nd day of September, 2020



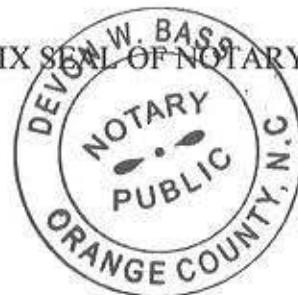
Notary Public

Devon W. Bass

Printed Name of Notary Public

My Commission Expires: 03/21/2023

[AFFIX SEAL OF NOTARY]



CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. E-100, Sub 165, a copy of the Petition to Intervene of Vote Solar via U.S. Mail or email transmission, where parties have consented to electronic service, on this day, September 2, 2020.

/s/

Thadeus B. Culley
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Sr. Regional Director and
Regulatory Counsel, Southeast
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