

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1254

In the Matter of:)
Application of Duke Energy)
Progress, LLC Pursuant to G.S. 62-)
110.8 and NCUC Rule R8-71)
Relating to CPRE Compliance)
Report and Program Costs)

PETITION OF NCSEA TO
INTERVENE

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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. NCSEA was actively involved in the negotiations that led to House Bill 589 and Session Law 2017-192, which adopted G.S. 62-110.8. NCSEA was also granted a petition to intervene and filed comments, reply comments, and supplemental reply comments in Docket No. E-100, Sub 150 which established Commission Rule R8-71 governing this competitive procurement of renewable energy program (“CPRE Program”). NCSEA was granted petition to intervene and is an active participant in the ongoing CPRE Program

implementation dockets, NCUC Dockets E-2, Sub 1159 & E-7, Sub 1156. NCSEA was also granted petition to intervene in NCUC Docket Nos. E-7, Sub 1170 and E-7, Sub 1231, which dealt with Duke Energy Carolinas, LLC's request for an accounting order to defer certain initial costs and to recover costs related to the CPRE Program respectively. In addition, many of NCSEA's members are developers of renewable energy projects that have substantial interest in the competitive procurement of renewable energy program and some are, in fact, market participants in the CPRE Program. As such, NCSEA has an interest in ensuring that the statute is implemented and the costs associated with the program are recovered in accordance with the intent of the legislature.

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
NCSEA
4800 Six Forks Road
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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,

 /s/ Peter H. Ledford
Peter H. Ledford
N.C. State Bar No. 42999
General Counsel
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VERIFICATION

Peter 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 26th day of June, 2020.



Peter Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 25 day of June, 2020.

[AFFIX SEAL OF NOTARY]



Notary Public



Victoria Prince Somol

Printed Name of Notary Public

My Commission Expires: 5-22-2022

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 25th day of June, 2020.

/s/ Peter H. Ledford
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