## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-2, SUB 1170 DOCKET NO. E-7, SUB 1169

In the Matter of:	)	
Petition of Duke Energy Progress, LLC,	)	
and Duke Energy Carolinas, LLC,	)	PETITION TO INTERVENE
Requesting Approval of Green Source	)	
Advantage Program and Rider GSA to	)	
Implement G.S. 62-159.2	)	

PURSUANT TO Commission Rule R1-19 and the Commission's *Order*Establishing Proceeding to Review Proposed Green Source Rider Advantage Program

and Rider GSA, Southern Alliance for Clean Energy ("Petitioner"), through counsel, files
this petition to intervene in the above-captioned docket, and provides the following
information in support of its petition:

- 1. On January 26, 2018, the Commission issued an *Order Establishing*Proceeding to Review Proposed Green Source Rider Advantage Program and Rider

  GSA, providing, among other things, that parties desiring to become formal participants and parties of record in this proceeding shall file petitions to intervene in accordance with applicable Commission rules by February 23, 2018.
- 2. This petition to intervene is timely filed, as the Commission has established an intervention deadline of February 23, 2018 for this proceeding.
- 3. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is: P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

- 4. SACE and its members have a direct and substantial interest in this proceeding. Many of SACE's members are customers of North Carolina electric utilities and, therefore, are impacted by the utilities' energy resource selections and renewable energy program offerings. SACE and its members are interested in promoting greater reliance on clean, low-cost energy resources to meet North Carolina's energy needs and increasing access to these resources for all customers, including large non-residential customers, universities, and the military.
- 5. Petitioners seek to intervene in this proceeding to ensure that their organizational interests and those of their members are represented in the Commission's process to review the proposed Green Source Advantage program.
- 6. The attorney for SACE to whom all correspondence and filings in this docket should be addressed is:

Peter D. Stein Southern Environmental Law Center 601 West Rosemary Street, Suite 220 Chapel Hill, NC 27516 (919) 967-1450 pstein@selcnc.org

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

WHEREFORE, SACE requests that it be allowed to intervene in this docket.

Respectfully submitted this 23rd day of February, 2018.

[SIGNATURE APPEARS ON FOLLOWING PAGE]

s/Peter D. Stein

Peter D. Stein N.C. Bar No. 50305

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Attorney for Southern Alliance for Clean Energy

## **VERIFICATION**

I, Peter D. Stein, 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 Southern Alliance for Clean Energy.

Peter D. Stein

Date: February 23, 2018.

Orange County, North Carolina

Sworn to and subscribed before me this day by Peter D. Stein.

This the 23 rd day of February, 2018.

Signature

Lou Ann Phelps, Notary Public

My commission expires: October 25, 2021

## **CERTIFICATE OF SERVICE**

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

This the 23rd day of February, 2018.

s/Peter D. Stein
Peter D. Stein