## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-100, SUB 150

In the Matter of:				)	NCSEA'S PETITION TO
Rulemaking	Proceeding	to	Implement	)	INTERVENE
G.S. 62-110.8				)	

## 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. 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. In addition, many of NCSEA's members are developers of renewable energy projects that are now or will be subject to the procurement requirements of G.S. 62-110.8. As such, NCSEA has an interest in ensuring that the statute is implemented 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 Counsel for NCSEA 4800 Six Forks Road Suite 300 Raleigh, NC 27609 (919) 832-7601 Ext. 107 peter@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,

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 31st day of July, 2017.

Peter H. Ledford

NORTH CAROLINA WAKE COUNTY

Notary Public

Sworn to and subscribed before me,

this the 31st day of July, 2017.

[AFFIX SEAL OF NOTARY]

Victoria Prince-Somol Notary Public Johnston County North Carolina My Commission Expires 5/22/202:

Drintad Nama of Natary Public

Printed Name of Notary Public

My Commission Expires: 5-22-227

## 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 31st day of July, 2017.

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