

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1283
DOCKET NO. E-7, SUB 1259

In the Matter of:)
Joint Petition of Duke Energy Carolinas,) NCSEA’S PETITION TO
LLC and Duke Energy Progress, LLC to) INTERVENE
Request the Commission to Hold a Joint)
Hearing with the Public Service)
Commission of South Carolina to Develop)
Carbon Plan)

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 actively involved in the development of House Bill 951 (S.L. 2021-165) and has a direct interest in seeing the policies and goals of the session law implemented in a manner consistent with legislative intent.
3. NCSEA has frequently appeared in proceedings before the Commission dealing with long-term planning. *See*, Docket No. E-100, Sub 111 (integrated resource plan

rulemaking); Docket No. E-100, Sub 128 (2010 integrated resource plans); Docket No. E-100, Sub 137 (2012 integrated resource plans); Docket No. E-100, Sub 141 (2014 integrated resource plans); Docket No. E-100, Sub 147 (2016 integrated resource plans); Docket No. E-100, Sub 157 (2018 integrated resource plans); Docket No. E-100, Sub 165 (2020 integrated resource plans).

4. NCSEA has been permitted to intervene in other proceedings before the Commission dealing with the implementation of House Bill 951. *See*, Docket No. E-100, Sub 177 (implementing House Bill 951's coal securitization provisions); Docket No. E-100, Sub 178 (implementing House Bill 951's performance-based regulation provisions).

5. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

6. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

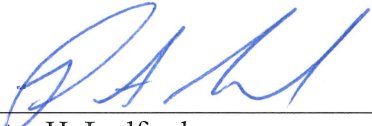
Peter H. Ledford
General Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

Benjamin Smith
Regulatory Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 111
ben@energync.org

7. 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 10th day of November 2021.




Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 10th day of November 2021.

[AFFIX SEAL OF NOTARY]



Notary Public

**Daniel G Brookshire, Notary Public
Orange County, North Carolina
My Commission Expires 7/2/2022**

Daniel G. Brookshire
Printed Name of Notary Public
My Commission Expires: 7-2-2022

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 10th day of November 2021.



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