

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-7, SUB 1155**

In the Matter of:)
Application of Duke Energy) **PETITION OF NCSEA TO**
Carolinas, LLC for Approval of) **INTERVENE**
Residential New Construction)
Program)

PETITION OF NCSEA 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. On August 16, 2019, NCSEA filed a consumer statement of position in this proceeding regarding Duke Energy Carolinas, LLC’s (“DEC”) Motion to Withdraw its application for the Residential New Construction program. On September 21, 2020, DEC filed a new proposal for a Residential New Construction program. On October 15, 2020, the Public Staff filed a motion for extension of time requesting a 30-day extension for parties to file comments on DEC’s new proposal. The Commission granted the Public Staff’s motion on October 20, 2020.

3. NCSEA is actively involved in DEC's energy efficiency collaborative, and NCSEA's interest in cases involving energy efficiency has routinely been recognized by the Commission. *See, e.g.*, Docket No. E-7, Sub 1230 (Vintage 12 Rider); Docket No. E-7, Sub 1192 (Vintage 11 Rider); Docket No. E-7, Sub 1164 (Vintage 10 Rider); Docket No. E-7, Sub 1130 (Vintage 9 Rider); Docket No. E-7, Sub 1105 (Vintage 8 Rider); Docket No. E-7, Sub 1073 (Vintage 7 Rider); Docket No. E-7, Sub 1050 (Vintage 6 Rider); Docket No. E-7, Sub 1031 (Vintage 5 Rider); Docket No. E-7, Sub 1001 (Vintage 4 Rider); Docket No. E-7, Sub 831 (NCSEA was permitted to intervene where DEC sought approval of Save-a-Watt and its first energy efficiency rider); see also Docket No. E-100, Sub 110 (a pre-REPS complaint brought by NCSEA against DEC to require increased use of energy efficiency).

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

5. 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
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4800 Six Forks Road
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6. 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
NCSEA
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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 21st day of October, 2020.



Peter Ledford

NORTH CAROLINA
WAKE COUNTY


Sworn to and subscribed before me,
this the 21st day of October, 2020.

[AFFIX SEAL OF NOTARY]



Notary Public

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



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 21st day of October, 2020.

 /s/ Peter H. Ledford
Peter H. Ledford
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