BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. M-100, SUB 145

In the Matter of: ) NCSEA’S PETITION TO
Rulemaking to Establish Procedure for ) INTERVENE
Settlements and Stipulated Agreements )

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. In the Petition for Rulemaking by NC WARN filed in the above-mentioned docket, the North Carolina Waste Awareness and Reduction Network, Inc. proposes rules regarding the procedure by which parties to Commission dockets enter into settlements or stipulated agreements. NCSEA frequently appears before the Commission in a wide variety of proceedings in which various parties may or may not enter into settlements or stipulated agreements. As a frequent participant in proceedings before the Commission, NCSEA has
an interest in rules regarding the procedure by which parties enter into settlements or stipulated agreements.

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 Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

   Peter H. Ledford   Michael Youth  
   Counsel for NCSEA  Counsel for NCSEA  
   4800 Six Forks Road  4800 Six Forks Road  
   Suite 300  Suite 300  
   Raleigh, NC 27609  Raleigh, NC 27609  
   (919) 832-7601 Ext. 107  (919) 832-7601 Ext. 118  
   peter@energync.org  michael@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,

   /s/ Peter H. Ledford
   Peter H. Ledford
   Counsel for NCSEA
   N.C. State Bar No. 42999
   4800 Six Forks Road
   Suite 300
   Raleigh, NC 27609
   (919) 832-7601 Ext. 107
   peter@energync.org
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 29th day of July, 2016.

/s/ Peter H. Ledford
Peter H. Ledford
Counsel for NCSEA
N.C. State Bar No. 42999
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org