Jan 13 2022

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-100, SUB 180

In the Matter of:)Investigation of Proposed Net Metering)NCSEA'S PETITION TOPolicy Changes)INTERVENE

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. On November 29, 2021, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC ("Duke") filed its *Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Net Energy Metering Tariffs in Compliance with G.S. § 62-126.4 and House Bill 951* ("Application") in Docket Nos. E-7, Sub 1214, E-2, Sub 1219, and E-2, Sub 1076.

3. On January 10, 2022, the Commission issued its *Order Requesting Comments* regarding Duke's application in the above-captioned docket.

4. NCSEA has been a long-time proponent of net metering. *See, Order Initiating Investigation and Requesting Comments*, Docket No. E-100, Sub 83 (November 18, 1998). Furthermore, NCSEA was an active participant in the legislative processes that led to the passage of both S.L. 2017-192, which adopted N.C. Gen. Stat. § 62-126.4, and S.L. 2021-165, better known as House Bill 951.

5. NCSEA is a signatory to the Memorandum of Understanding that was attached to Duke's Application.

NCSEA has intervened in each of Docket Nos. E-7, Sub 1214, E-2, Sub 1219, and
E-2, Sub 1076 where Duke filed its Application and Docket No. E-100, Sub 83.

7. NCSEA's membership includes residential rooftop solar installers, adopters, and potential adopters who work or live in Duke's service territory.

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

9. 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	Benjamin W. Smith
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. 111
peter@energync.org	ben@energync.org

10. 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

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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 13^{μ} day of January 2022.

Peter H. Ledford

NORTH CAROLINA WAKE COUNTY

Sworn to and subscribed before me,

this the 3 day of January 2022.

Daniel D. Brockshing Notary Public

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

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

[AFFIX SEAL OF NOTARY]

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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 13th day of January 2022.

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