

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-7, SUB 1249

In the Matter of: )  
Application of Duke Energy )  
Carolinas, LLC for Approval of )  
Demand-Side Management and ) **PETITION TO INTERVENE**  
Energy Efficiency Cost Recovery )  
Rider Pursuant to N.C. Gen. Stat. § )  
62-133.9 and Commission Rule R8- )  
69 )

PURSUANT TO Commission Rule R1-19, the North Carolina Justice Center (“NCJC”), the North Carolina Housing Coalition (“NC Housing Coalition”), and the Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), through counsel, file this petition to intervene in the above-captioned docket, and provide the following information in support of their petition:

1. N.C. Gen. Stat. § 62-133.9(d) authorizes the Commission to approve an annual rider to the rates of an electric public utility to recover all reasonable and prudent costs of new demand-side management (“DSM”) and energy efficiency (“EE”), as well as incentives. On February 23, 2021, Duke Energy Carolinas, LLC (“DEC”) filed an application for approval of its DSM and EE cost recovery and incentive rider (“Rider 13”). The proposed Rider 13 consists of components calculated under DEC’s “save-a-watt” cost recovery and incentive mechanism approved in Docket No. E-7, Sub 831, as well as under DEC’s new cost recovery and incentive mechanism approved in Docket No. E-7, Sub 1032. Commission Rule R8-69(b) provides that each year, the Commission will conduct a proceeding for each electric utility to establish an annual DSM/EE

rider. This is the annual proceeding under N.C.G S. § 62-133.9(d) and Commission Rule R8-69(b).

2. The North Carolina Justice Center (“NC Justice Center”) is a nonprofit research and advocacy organization whose mission is to eliminate poverty in North Carolina by ensuring that every household in the state has access to the resources, services and fair treatment it needs to achieve economic security. The NC Justice Center has offices at 224 S. Dawson Street, Raleigh, North Carolina 27601.

3. The NC Justice Center has previously intervened on behalf of low-income North Carolinians in proceedings before the Commission, and participated actively in Docket No. E-7, Sub 831, in which DEC’s prior DSM/EE mechanism was approved and also participated actively in annual DSM/EE rider proceedings in Docket Nos. E-7, Sub 1130, E-7, Sub 1164, E-7, Sub 1192, and E-7, Sub 1230.

4. The NC Justice Center and the low-income consumers whose interests it represents have a direct and substantial interest in this proceeding. Many of the low-income consumers represented by the NC Justice Center are customers of DEC and are therefore subject to the direct impacts of DEC’s DSM/EE rider. The NC Justice Center seeks to intervene in this proceeding in order to ensure that its interests in promoting energy efficiency programs that help lift the energy burden borne by low-income households are represented.

5. The North Carolina Housing Coalition (“NC Housing Coalition”) is a nonprofit membership organization with the goal of ensuring that every North

Carolinian has access to safe, decent, and affordable housing. The principal address of the NC Housing Coalition is 104 City Hall Plaza, Ste. 201, Durham, North Carolina 27701.

6. NC Housing works with its members to reduce the energy burdens faced by low-income residents. In addition, as part of its efforts to improve access to affordable housing for low-income individuals, NC Housing Coalition advocates for fair and affordable utility rates and charges. NC Housing Coalition has members who are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. NC Housing Coalition has previously intervened in proceedings before the Commission on behalf low-income North Carolinians. NC Housing has participated in DSM/EE rider proceedings previously in Docket No. E-7, Sub 1230 as well as in DEC's last general rate case in Docket No. E-7, Sub 1214.

7. Southern Alliance for Clean Energy ("SACE") is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

8. SACE participated actively in and was a party to the stipulations of settlement reached in Docket Nos. E-7, Sub 831 and E-7, Sub 1032, and also participated actively in the past ten annual DSM/EE rider proceedings, Docket Nos. E-7, Sub 979, E-7, Sub 1001, E-7, Sub 1031, E-7, Sub 1050, E-7, Sub

1073, E-7, Sub 1105, E-7, Sub 2230, E-7, Sub 1164, E-7, Sub 1192, and E-7, Sub 1230.

9. SACE and its members have a direct and substantial interest in this proceeding. SACE has members who are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. SACE seeks to intervene in this proceeding in order to ensure that its members' interests in promoting energy savings through cost-effective DSM and EE are represented. SACE is also interested in ensuring that DEC's DSM and EE programs are delivering results, and that the costs and incentives to be recovered via the rider are based on measured and verified energy savings.

10. The attorneys for the NC Justice Center, NC Housing Coalition, and SACE to whom all correspondence and filings in this docket should be addressed are:

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Service by electronic mail pursuant to NCUC Rule R1-39 is preferred and should be addressed to: [dneal@selcnc.org](mailto:dneal@selcnc.org), [gthompson@selcnc.org](mailto:gthompson@selcnc.org), and [tmoore@selcnc.org](mailto:tmoore@selcnc.org).

WHEREFORE, the NC Justice Center, NC Housing Coalition, and SACE request that they be allowed to intervene in this docket.

Respectfully submitted this the 16<sup>th</sup> day of April, 2021.

s/ David Neal

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CERTIFICATE OF SERVICE

I certify that the parties of record on the service list have been served with the Petition to Intervene by the North Carolina Justice Center, North Carolina Housing Coalition, and Southern Alliance for Clean Energy either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 16<sup>th</sup> day of April, 2021.

s/ David L. Neal  
David L. Neal