

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1142**

<b>In the Matter of:</b>	)	
<b>Application of Duke Energy</b>	)	<b>PETITION OF NCSEA TO</b>
<b>Progress, LLC for Adjustment of</b>	)	<b>INTERVENE</b>
<b>Rates and Charges Applicable to</b>	)	
<b>Electric Service in North Carolina</b>	)	

**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. NCSEA was a chief proponent of the REPS law, has substantial organizational awareness of the law and its implementation, and has a direct interest in seeing the policies and goals of the REPS law achieved in a manner consistent with the legislative intent. The interest of NCSEA and its members in the REPS law, renewable energy, and energy efficiency extends to dockets such as this one for a multitude of reasons. NCSEA's members are not only customers of electric service providers, including Duke Progress, LLC, they are also proponents of renewables-based generation and energy efficiency. As

such, they have a strong interest in the rates and charges for electricity in this State. NCSEA's interest in cases such as this one has been recognized by the Commission. See, e.g., NCUC Docket No. E-7, Sub 989 (NCSEA was permitted to intervene in the 2011 Duke Energy Carolinas, LLC base rate case); NCUC Docket No. E-2, Sub 1023 (Progress Energy Carolinas, Inc.'s 2012-13 base rate case); NCUC Docket No. E-7, Sub 1026 (Duke Energy Carolinas, LLC 2013 base rate case); NCUC Docket No. E-22 Sub 532 (Dominion North Carolina Power's 2016 base rate case).

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

Peter H. Ledford  
Counsel for NCSEA  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609  
(919) 832-7601 Ext. 107  
peter@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  
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 23 day of May, 2017.

  
\_\_\_\_\_  
Peter H. Ledford

NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me,

this the 23<sup>rd</sup> day of May, 2017.

  
\_\_\_\_\_  
Notary Public

[AFFIX SEAL OF NOTARY]



Jessica Seifert  
\_\_\_\_\_  
Printed Name of Notary Public  
My Commission Expires: 8-4-18

**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 23rd day of May, 2017.

          /s/ Peter H. Ledford            
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General Counsel  
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