BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1153

In the Matter of: Petition of Duke Energy Progress, LLC for an Order Approving a Job Retention Rider

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. NCSEA is a party to Commission Docket No. E-100, Sub 73, in which the Commission adopted guidelines for job retention tariffs. In addition, NCSEA’s membership includes customers of Duke Energy Progress, LLC who have direct and substantial interests in this proceeding.

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,

    [Signature]

    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 17th day of August, 2017.

[Signature]

Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 17th day of August, 2017.

[Signature]

Daniel G. Brookshire, Notary Public

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 17th day of August, 2017.

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