BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
UTILITIES COMMISSION

DOCKET NO. 2015-53-E

IN RE: Application of Duke Energy Progress, Incorporated to Establish a Distributed Energy Resource Program	)))))))	**PETITION TO INTERVENE OF THE ALLIANCE FOR SOLAR CHOICE**

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission's ("Commission") Rules of Practice and Procedure, The Alliance for Solar Choice ("TASC"), through its undersigned counsel, respectfully submits this Petition to Intervene in the above-captioned proceeding. TASC states the following information in support of its Petition:

1. TASC leads advocacy across the country for the rooftop solar industry. Founded by the largest rooftop solar companies in the United States, TASC represents the vast majority of the market nationwide. Its members include Demeter Power, Silevo, SolarCity, Solar Universe, Sunrun, Verengo, and ZEP.

2. TASC was formed on the belief that consumer's should have the option to switch to onsite solar power for at least a portion of their energy supply. Accordingly, TASC is committed to defending policies, such as net metering, that provide fair credit to residents, businesses, churches, schools, and public agencies when their rooftop solar systems export power to a utility's grid.

3. The name and business address of Petitioner are:

The Alliance for Solar Choice
595 Market St, 29th Floor
San Francisco, CA 94105

4. Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, TASC is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina and requests that the following persons be added to the official service list:

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5. Communications regarding this docket should be directed to TASC's counsel of record. TASC consents to service via email.

6. On December 11, 2014, the South Carolina Office of Regulatory Staff ("ORS") filed a settlement agreement in Docket No. 2014-246-E ("Settlement Agreement")[2] addressing the net metering methodology required by statute and establishing other aspects of net metering program for the specified settlement period, including establishing certain minimum elements for the utilities' Distributed Energy

[1] Mr. Culley, through local counsel, intends to file a *Verified Application for Admission Pro Hac Vice* with the South Carolina Supreme Court and a *Motion for Admission Pro Hoc Vice* with the Commission to appear in this proceeding.
[2] The Commission issued Order No. 2015-194 on March 20, 2015, which approved the Settlement Agreement.

Resources ("DER") Program Applications. Duke Energy Progress, Inc. ("DEP") and TASC[3], among others, are signatories to the Settlement Agreement.

7. The Commission issued Order No. 2015-194 on March 20, 2015, which approved the Settlement Agreement.

8. In part, the Settlement Agreement requires DEP's DER Application to include measures to provide an upfront and/or production-based incentive to customer-generators with systems of 20 kW or less:

> "The Utilities shall propose to make available DER incentives available to Residential/Small Commercial customer-generators with production of less than 20 kW ("Residential/Small Commercial DER Incentives") that provide these customer generators with an investment incentive (i.e., an up-front incentive or rebate) and/or a fixed, production-based incentive payment. These incentives shall provide price certainty to the customer-generator over a defined term."[4]

9. As a signatory to the Settlement and an active participant in negotiating its terms and conditions, TASC has a substantial interest in ensuring that the Settlement is implemented in an efficient manner to support expansion of energy choice for the citizens of South Carolina. This proceeding will have a direct impact on the ability of third-party owners of solar generation facilities, such as the members of TASC, to effectively market and offer services to consumers in DEP's territory. TASC and its member companies, thus, have a direct and material interest in the Commission's implementation of the Distributed Energy Resource Program Act ("Act 236"), DEP's specific implementation of Act 236, and the performance of

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[3] TASC was granted intervention as a party in Docket No. 2014-246-E on August 20, 2014.

[4] Settlement Agreement Section III.1.a.

obligations agreed to in the Settlement regarding the proposal of this DER application. No other party will adequately represent the interests of TASC in this proceeding. In light of the above, TASC has standing to intervene in this proceeding.

10. TASC's participation in this proceeding will promote the public interest by furthering the development of policies that allow the competitive market for solar services to deliver efficient solutions while increasing customer choices in how they may participate in DEP's DER program offerings.

WHEREFORE, TASC respectfully requests the Commission allow it to intervene in this proceeding and to participate fully as a party, including the ability to appear as a party, conduct discovery and participate in hearings by offering testimony and supporting exhibits, and cross-examining witnesses.

Respectfully submitted this 2nd day of April, 2015.

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The undersigned, Joseph M. McCulloch, Jr., Esquire, does hereby certify that he has served the persons listed below with a copy of the **Petition to Intervene of The Alliance for Solar Choice** in the above-captioned proceeding by dispatching a copy to them via U.S. Mail or electronic mail at the addresses listed below on April 2, 2015.

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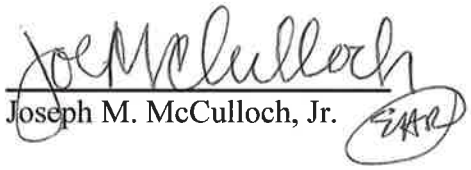
April 2, 2015
Columbia, South Carolina



Joseph M. McCulloch, Jr.