STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2015-362-E

In re: Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard	)	**PETITION TO INTERVENE**

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") (collectively, the "Conservation Groups") respectfully petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R.103-825 of the Commission's rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The Commission opened this proceeding on the Joint Application of Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP"), and South Carolina Electric & Gas Company ("SCE&G" and together with DEC and DEP, the "Utilities") for Approval of the Revised South Carolina Interconnection Standard ("the Application"). The Application was filed with the Commission on October 9, 2015.

2. This Petition to Intervene is timely filed, as the Commission has established an intervention deadline of November 23, 2015 for this proceeding.

3. The Utilities filed their Application pursuant to Section 58-39-110 of the Distributed Energy Resources Program Act ("the Act"). This section of the Act provides that the "commission shall promulgate standards for interconnection of renewable energy facilities and other nonutility-owned generation with a generation capacity of two thousand kilowatts (2,000 kW AC) or less to an electrical utility's distribution system."

4. The South Carolina Coastal Conservation League ("CCL") is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from the Utilities and will be impacted by the decisions made in this proceeding regarding renewable energy and the ability to interconnect distributed energy resources to the electricity grid. The address of CCL's main office is 328 East Bay Street, Charleston, SC 29402.

5. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Utilities and will be impacted by the decisions made in this proceeding

regarding renewable energy and the ability to interconnect distributed energy resources to the electricity grid. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

6. The Conservation Groups and their members have direct and substantial interests in the interconnection standards to be promulgated by the Commission in this proceeding, and their interests cannot be adequately addressed by any other party. The Conservation Groups' position in this proceeding is to advocate for interconnection standards that will best support development of an effective and diversified portfolio of distributed energy resources and lead to cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 20th day of November, 2015.

s/ J. Blanding Holman, IV
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Attorney for Petitioners South Carolina Coastal Conservation League and Southern Alliance for Clean Energy

* Ms. Bowen, 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.

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 20th day of November, 2015.

s/ Lauren Bowen
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