

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2015-362-E**

IN RE: Joint Application of Duke Energy	)	
Carolinas, LLC, Duke Energy	)	<b>JOINT PETITION</b>
Progress, LLC and South Carolina	)	<b>TO</b>
Electric & Gas Company for Approval	)	<b>INTERVENE</b>
of the Revised South Carolina	)	
Interconnection Standard.	)	

**INTRODUCTION**

A Commission Docket was opened in this matter on October 12, 2015, by Duke Energy Carolinas, LLC, (“DEC”), Duke Energy Progress, LLC “(DEP)” and South Carolina Electric & Gas Company, (“SCE&G”) and assigned the above-referenced Docket number. Joint Petitioners’ herein, are (i) Solbridge Energy LLC and (ii) Sustainable Energy Solutions, LLC. This Joint Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Joint Petition to Intervene follows:

**JOINT PETITIONERS**

Solbridge Energy LLC.

1. Solbridge Energy LLC (hereinafter, “Solbridge Energy”), is a Delaware Corporation, domesticated to conduct business in the State of South Carolina, with its principal place of business in Charleston, South Carolina.
2. Solbridge Energy is a Solar Development Company. Their business model is to (i) identify financially viable opportunities to build solar power plants (ii) package each solar power plant as a distinct project and investment opportunity, and (iii) manage the installation and ongoing operations of each project. Solbridge Energy focuses on projects ranging in size between one to 80 megawatts, located primarily along the Eastern Seaboard. Solbridge Energy, along with its development partner, controls a portfolio of approximately 500 MW.

Sustainable Energy Solutions, LLC.

3. Sustainable Energy Solutions, LLC (hereinafter, “Sustainable Energy”), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Charleston, South Carolina.

4. Sustainable Energy is a renewable energy solutions provider, with a focus on solar thermal and photovoltaic energy systems. Sustainable Energy has installed over 200 Solar Energy Systems in six different States. Their services include planning, consulting, design, system installation and maintenance and project development.

5. As a developer, Sustainable Energy controls a pipeline of 500 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina, Arkansas, Alabama, Mississippi and Florida. Sustainable Energy’s projects range in size from 1 to 80 MW.

Request for Joint Intervenors Status.

6. Although Solbridge Energy and Sustainable Energy are separate legal entities, they share: common business interest, financing sources and are joint development partners.

7. This Commission has previously allowed joint intervention by Solbridge Energy and Sustainable Energy. Because of their closely interrelated interests in this Docket, Solbridge Energy and Sustainable Energy are filing this, “Joint Petition to Intervene”.

8. Joint Petitioners were granted leave by this Commission, to Intervene in the Genesis Docket related to the Distributed Energy Resource Program Act, Act No. 236 of 2014 in Docket 2014-246-E (hereinafter as the, “Act”) and Joint Intervenors participated in the Hearing held in that Docket.

9. Joint Petitioners conduct and plan to conduct, business in DEC’s, DEP’s and SCE&G’s territories, including sales to the stated Utilities’ Consumers.

10. Joint Petitioners participated in the discussions leading up to the Act.

11. Joint Petitioners have participated in Dockets related to the Act and this Commission has also granted Joint Petitioners’ Intervenors status in related Dockets, 2015-53-E, 2015-55-E, 2015-203-E, 2015-204-E, and 2015-205-E.

DEC'S, DEP'S and SCE&G's Application.

12. Section 6 of the Distributed Energy Resource Program Act, Act No. 236 of 2014 in Docket 2014-246-E, ("Act"), directed this Commission to promulgate standards for interconnection of renewable energy facilities and other nonutility-owned generation with an electrical utility's distribution system.

13. All three Applicants have jointly proposed a new Interconnection Standard for South Carolina and attached the same to their Joint Application, as Exhibit "1", thereto.

14. The proposed new Interconnection Standard for South Carolina is outlined and supported in the Joint Application, and the Joint Petitioners herein, appreciate the efforts of the companies and the Office of Regulatory Staff, to include stake holders in discussions leading up to the proposed new Interconnection Standard by the Applicants.

15. Joint Petitioners' position is that they have a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's approval of the Applicants proposed new Interconnection Standard for South Carolina and Joint Petitioners' interests cannot be adequately addressed by any other party. Joint Petitioners' further position is that although this Commission must approve a new Interconnection Standard, the specifics thereof, are important to the Joint Petitions, from a financial standpoint. Joint Petitioners' further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. Joint Petitioners have a direct and material interest in the issue to be addressed and resolved by this Commission in this Docket and Joint Petitioners interests are not adequately represented by the current parties in this Docket.

16. This Joint Petition to Intervene is timely filed with this Commission.

17. Joint Petitioners' Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

18. Joint Petitioners should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

**JOINT PETITION TO INTERVENE**

19. The granting of Solbridge Energy LLC's Petition to Intervene and Sustainable Energy Solutions, LLC's Petition to Intervene, filed jointly is (i) consistent with the Settlement Agreement, reached concerning the Act (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

20. Solbridge Energy LLC and Sustainable Energy Solutions, LLC are represented by counsel in this proceeding:

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**WHEREFORE**, Joint Petitioners pray for the following relief:

- (a) That this Joint Petition to Intervene be accepted and that Joint Petitioners be made parties of record;
- (b) That Joint Petitioners be allowed to participate fully in this proceeding and take such positions as they deem advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

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November 9, 2015  
Columbia, South Carolina