

May 6, 2019

Ms. Martha Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

RE: Duke Energy's Electric Transportation Pilots – Dockets E-2, Sub. 1197 and E-7, Sub.1195

The Alliance of Automobile Manufacturers, the Association of Global Automakers, General Motors LLC, Ford Motor Company, Jaguar Land Rover North America, Daimler North America Corporation, Mitsubishi Motors R&D of America, Fiat Chrysler Automobiles, Nissan North America, American Honda Motor Company Inc, Kia Motors Corporation, and Hyundai Motor Company (collectively referred to as "Joint Automakers") thank you for the opportunity to provide this letter in support of Duke Energy's Electric Transportation (ET) Pilot program. Duke Energy's proposed projects would drive transportation electrification for individuals, fleets, and transit agencies by adding infrastructure for charging in the home, at the workplace, and in public spaces.

Our associations and companies are invested in and support the electrification of vehicles, and our companies are working diligently to expand offerings, including plug-in and fuel cell electric vehicles, in a variety of ranges, price points and vehicle types to meet all customers' needs and further the reduction of transportation-related carbon emissions.

To achieve the goal of Governor Cooper's Executive Order 80 of 80,000 zero emission vehicles (ZEVs) by 2025, it will be critical for North Carolina to expand transportation electrification infrastructure and consumer outreach efforts. We are supportive of Duke Energy's proposed program that will help to do just that. Delaying approval of this application will only slow the state's response to the need for electrification infrastructure.

The program proposed by Duke Energy comes at an important time, as it represents an opportunity to increase charging stations and equipment. These are both critical components to building a robust market for electric vehicles and to encouraging people to drive electric vehicles (EVs). More specifically, expanding infrastructure will ultimately support an increase in the number of electric vehicles in North Carolina.

The ET Pilot program addresses seven specific objectives, all of which are important to increase the amount of electric vehicle infrastructure available to accommodate the growing number of EVs entering the market. We want to specifically highlight below the proposed residential rebates, multi-family unit program, and education and outreach.

Residential charging continues to be the main charging source for EV customers. Duke Energy's proposed \$1,000 rebate for the installation of qualified L2 electric vehicle service equipment (EVSE) with load control for 800 residential units will reduce some of the cost burden of the installation of such equipment for EV customers. Reducing the cost burden of EVSE can also make the purchase of EVs more appealing for potential customers, hence increasing the EV market in North Carolina.

Availability of charging infrastructure at multi-family dwellings continues to be cited as a barrier for such tenants to purchase an EV, primarily because they do not have access to home-based charging

infrastructure in the same way as a single residence would have. Similar to residential charging, charging at multi-family dwellings is critical in order for the EV market to move forward and expand the market to those customers who do not own a stand-alone home. Duke Energy's Pilot program will make 160 multi-family charging units publicly available for tenant use without out of pocket costs from the property owner or host site for the installation. Charging at multi-family dwellings is an important barrier to expand the EV market in North Carolina, and the Joint Automakers support Duke Energy's proposal.

In addition, the inclusion of an "Education and Outreach Plan" is a critical element, because utilities have an existing, wide and broad network for reaching customers. They also have the right level of information to assist customers in understanding important concepts like home charging set ups, rates and advantageous times to charge. For example, in the State of California, utilities have long played a role in distributing information, offering competitive charging rates, and working directly with consumers to provide rebates for chargers and charging, all of which result in increased customer awareness and enhanced customer experience; these efforts have greatly contributed to California's ever-growing EV market. Thus, we cannot underscore enough the importance of implementing a plan for customer outreach as part of Duke Energy's proposals.

On behalf of the wide range of people in North Carolina who will benefit, we urge the North Carolina Utilities Commission to accept Duke Energy's proposed electric transportation pilot program to continue on the path that North Carolina has set toward a sustainable energy future.

Sincerely,

Dan Bowerson

Director, Vehicle Electrification & Fuels, Alliance of Automobile Manufacturers

Julia M. Rege

Senior Director, Environment and Energy, Association of Global Automakers

Britta K. Gross

Director, Advanced Vehicle Commercialization Policy, General Motors LLC

Steve Henderson

Manager, Electrification Policy and Projects, Ford Motor Company

Chris Marchand

Vice President, Government and Industry Relations for the Americas, Jaguar Land Rover North America

David M. Trebing

General Manager, State and Local Relations, Daimler North America Corporation

Stephane Thiriez

Director, Regulatory Affairs, Mitsubishi Motors R&D of America

Mark Chernoby

Chief Technical Compliance Officer, Fiat Chrysler Automobiles (FCA US LLC)

Tim Slattery
Senior Manager, Government Relations, Nissan North America

Jessalyn Ishigo
Connected and Environmental Business Development, American Honda Motor Co., Inc.

James Alvis
Senior Manager, Government Affairs, Kia Motors Corporation

David E. Bauer
Senior Manager, Government Affairs, Hyundai Motor Company