# STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 1197 DOCKET NO. E-7, SUB 1195

#### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF	)	
	)	
APPLICATION BY DUKE	)	PETITION TO INTERVENE OF
ENERGY CAROLINAS, LLC AND	)	GREENLOTS
DUKE ENERGY PROGRESS, LLC	)	
FOR APPROVAL OF PROPOSED	)	
ELECTRIC TRANSPORTATION	)	
PILOT	)	

Pursuant to Rule R1-19 of the Commission's Rules and Regulations, Zeco Systems, Inc. d/b/a Greenlots ("Greenlots") files this petition to intervene in the above-captioned proceedings. In support of its petition, Greenlots states:

1. The name and mailing address of the Petitioner are:

Zeco Systems, Inc. d/b/a Greenlots 767 S. Alameda Street Second Floor Los Angeles, CA 90021

2. The name and address of Petitioner's attorney are:

Daniel C. Higgins Burns, Day & Presnell, P.A. P.O. Box 10867 Raleigh, N.C. 27605 dhiggins@bdppa.com

3. Greenlots is a corporation organized and existing under the laws of the State of Delaware, headquartered in California. Greenlots is a leading provider of electric vehicle ("EV") charging software and services, and is committed to accelerating transportation electrification in North Carolina. The Greenlots network supports a significant percentage

of the DC fast charging infrastructure in North America, and an increasing percentage of the Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing, while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions. The Greenlots footprint spans 13 countries, and includes deployment in North Carolina, and is accelerating the electric mobility future through the delivery of innovative software and services to empower utilities, cities, communities and automakers to deploy EV charging infrastructure at scale.

- 4. On March 29, 2019, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, the "Duke Entities") filed their proposed electric transportation pilot in these dockets.
- 5. As a provider of EV charging software, equipment, and services to a range of clients, including both consumers and utilities, Greenlots has a direct and substantial interest in this proceeding. Specifically, Greenlots has a significant interest in the growth of electric vehicle charging infrastructure, the role of utilities in scaling the market for electric vehicle charging infrastructure, and in regulatory developments that affect this landscape.
- 6. Greenlots has a direct and substantial economic interest in the sustainable and scalable growth of North Carolina's EV and EV infrastructure markets and in the broader regulatory and business landscape that affects the prospects of current and future business endeavors in North Carolina. Greenlots' interests will be affected by the Commission's final determination in this proceeding and it is in the public interest to grant Greenlots' petition to participate in this proceeding. No other party can adequately

represent the interests of Greenlots, and Greenlots participation would be in the public interest.

7. Greenlots requests that any notices, filings or other communications with respect to this Petition be served on the following:

Daniel C. Higgins Burns, Day & Presnell, P.A. P.O. Box 10867 Raleigh, N.C. 27605 dhiggins@bdppa.com

#### With copies to:

Thomas Ashley, VP Policy Greenlots 767 S. Alameda Street Second Floor Los Angeles, CA 90021 Phone: 424.372.2577 tom@greenlots.com

8. Pursuant to Commission Rule R1-39, Greenlots agrees to electronic service of all pleadings and other filings in this matter.

**WHEREFORE**, for the foregoing reasons, Greenlots respectfully requests that the Commission:

- 1. Grant Greenlots' request that it be permitted to intervene and to become party to these dockets;
- 2. Grant Greenlots' request that it be permitted to file comments and other papers, call and examine witnesses, cross-examine other witnesses and be heard on matters relative to the issues involved in these dockets; and
  - 3. For such other and further relief as the Commission deems just and proper.

Respectfully submitted, this the 6<sup>th</sup> day of May, 2019.

BURNS, DAY & PRESNELL, P.A.

Bv:

Daniel C. Higgins P.O. Box 10867

Raleigh, North Carolina 27605 Telephone: (919)782-1441 E-mail: <a href="mailto:dhiggins@bdppa.com">dhiggins@bdppa.com</a> Attorneys for the Greenlots

### **VERIFICATION**

Thomas Ashley, first duly sworn, deposes and says that he is Vice President, Policy, for Greenlots, that he has read the foregoing Petition and that the same is true of his own knowledge, except as to those matters and things therein alleged upon information and belief, which he believes to be true.

This the day of May, 2019.

Sworn to and subscribed before me, this the 6<sup>th</sup> day of May, 2019.

Notary Public D1314

My Commission expires:



## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing document was duly served upon counsel of record for the Public Staff and all parties to these dockets by either depositing same in a depository of the United States Postal Service, first-class postage prepaid, addressed as shown below, or by electronic delivery.

This the 6<sup>th</sup> day of May, 2019.

BURNS, DAY & PRESNELL, P.A.

Dahiel C. Higghs Post Office Box 10867 Raleigh, NC 27605

Tel: (919) 782-1441