

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-2, SUB 1197
DOCKET NO. E-7, SUB 1195**

In the Matter of:)	
Application by Duke Energy Carolinas,)	CCEBA’S INITIAL
LLC and Duke Energy Progress, LLC for)	COMMENTS ON MAKE
Approval of Proposed Electric)	READY CREDIT
Transportation Pilot)	PROGRAMS

CCEBA’S INITIAL COMMENTS ON MAKE READY CREDIT PROGRAMS

Pursuant to the North Carolina Utilities Commission’s (“Commission”) *Order Requesting Comments* issued on May 28, 2021, the Carolinas Clean Energy Business Association (“CCEBA”), an intervenor in the above-captioned proceeding, respectfully submits the following comments in general support of the Make Ready Credit (“MRC”) programs application (“Application”) proposed in this proceeding by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (DEP and DEC collectively “Companies”) on March 29, 2019. As discussed by the Companies, MRC programs harmonize with state goals to increase the deployment and adoption of electric vehicles (“EV”) by reducing the costs of installing in-home or onsite non-residential EV Service Equipment (“EVSE”)

While the MRC program is expected to evolve and incorporate lessons learned from program implementation and market or technology changes, CCEBA agrees with the Companies’ decision not to confine the program to a pilot offering. CCEBA believes that the rate of EV adoption will escalate steeply in the next few years. From the standpoint of continuity and market transformation, the market needs a durable and predictable structure to help reduce the upfront expense of electrifying the transportation sector. CCEBA

supports adjusting and evolving these MRC programs as they progress, but sees no reason to arbitrarily limit the availability of this support at this time.

Transparency and cost certainty is paramount for the MRC program to be a widely used tool by service providers. Based on the Companies' filing, CCEBA continues to have questions regarding the calculation of the credit for all customer types. CCEBA supports the recommendations of the North Carolina Sustainable Energy Association ("NCSEA") that the Companies provide the maximum Make Ready Credit amount as publicly available information, and not as a confidential number. CCEBA also supports NCSEA's recommendation that the Commission investigate and exercise oversight in the implementation of the Companies' proposed Contractor Credit Option to ensure the program is implemented in a nondiscriminatory manner that preserves competition.

CCEBA also supports using the MRC program as an opportunity to understand both EV-related load and market trends. The point of application is a prime touchpoint to encourage or require program participants to participate in market surveys to understand the anticipated usage of EVs and willingness to participate in other demand response offerings such as managed charging or future potential vehicle-to-grid offerings. Additionally, load data from customers installing EVSE could help give the Companies and other parties visibility into the disaggregated effects of EV load on the distribution system (*see* Application ¶ 22). As trends emerge in mass-market adoption of EVs, research and data on customer adoption patterns--including whether adoption is geographically clustered--will be essential in informing integrated system operations planning ("ISOP"). CCEBA supports maximizing the quality of market and load data from the MRC programs

to inform other ongoing efforts to efficiently and cost-effectively integrate distributed energy resources into ISOP.

CCEBA supports MRC programs as a complement to the competitive EV charging market in order to accelerate third-party investment in EVSE, provide a wide variety of technological choices in the market, allow MRC participants to effectively operate EVSE deployed on their premises, and leverage private investment.

Respectfully submitted, this the 8th day of July, 2021.

/s/ John D. Burns
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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing filing by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 8th day of July, 2021.

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