

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

**Re: SSDN Comments on Duke Energy's Proposed Electric Transportation Phase II Pilot and Make Ready Credit Programs; Docket Nos. E-2, Sub 1197 and E-7, Sub 1195**

Dear Ms. Campbell:

On behalf of the Southeast Sustainability Directors Network's (SSDN) members, we greatly appreciate this opportunity to submit comments regarding Duke Energy's proposed Electric Transportation (ET) programs and tariffs.<sup>1</sup> SSDN is a network of 90 city and county governments in 10 states across the southeastern United States that works together to advance sustainability initiatives in the region. SSDN's membership includes 21 local governments<sup>2</sup>, led by sustainability staff, from throughout North Carolina and we regularly engage in conversations with utilities and various stakeholders to help ensure that clean energy programs that directly impact our communities' residents and/or their government operations are developed and implemented as effectively as possible.

SSDN commends the efforts of Duke Energy and the North Carolina Utilities Commission to address the opportunities and challenges presented by transportation electrification in North Carolina. These efforts will advance our state toward a cleaner, more sustainable energy future that decreases carbon emissions, improves the health of North Carolinians, and ultimately lowers energy costs for everyone. Local governments would, in particular, like to express our appreciation for being included in the recently convened ET collaborative stakeholder process, which was established as part of the Commission's November 24, 2020 order; we began participating in mid-February 2021. The Commission order dated June 14, 2021 is an appreciated step in helping to solidify and clarify an ongoing stakeholder engagement process.

Cities, towns and counties are significant users of our state's electricity, both because of the amount of energy consumed in local government facilities and because of the energy consumed by businesses and residents in our communities. Thus, local governments can provide unique customer perspective, input and feedback regarding ET pilot programs to the NC Utilities Commission, Duke Energy, and

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<sup>1</sup> DEC and DEP's Make Ready Credit Programs and Tariffs filed on April 20, 2021, and DEC and DEP's Request for Approval of Phase II ET Pilot Programs, filed on May 24, 2021

<sup>2</sup> SSDN's NC members include: Asheville, Apex, Boone, Buncombe County, Carrboro, Cary, Chapel Hill, Charlotte, Chatham County, Davidson, Durham, Durham County, Henderson County, Hillsborough, Mecklenburg County, Morrisville, New Bern, Orange County, Raleigh, Wilmington, and Winston-Salem.

participating intervenors or stakeholders – we want to be an active part of the conversation around how North Carolina’s power is generated, used by consumers, and made more efficient.

Increasingly, local governments in North Carolina and across the South are establishing long-term sustainability goals to reduce emissions, scale up investment in clean energy, create economic opportunities and jobs, and deliver immediate public health benefits to their residents and businesses. For instance, many cities, towns and counties in North Carolina are adopting goals to achieve significant greenhouse gas emission reductions and/or to power their communities with 100% renewable energy.

In order to reach these goals, local governments are implementing numerous initiatives and strategies, which include efforts to advance programs, plans and policies that expand the use of zero emission vehicles and increase electric vehicle charging infrastructure across all regions of North Carolina. Below are specific comments related to the Make Ready Credit Programs and Phase II Electric Transportation Pilot Programs proposed by Duke in which we offer our support and/or additional feedback:

### **Make Ready Credit and Phase II Pilot Programs**

We look forward to continued stakeholder engagement on the companies’ EV related proposals as mentioned in Duke’s filing and the recent commission order.

#### Data-access:

Local governments are unique in that they fulfill a variety of roles--they are large customers (with fleets), property owners that can serve as site hosts for the public charging pilots, makers of public policy, and stewards of their communities. As site hosts, local governments would benefit from readily available and timely data related to specific EVSE including data points like total hours of use, number of unique users, duration of stays, patterns related to time of use (e.g., day of week, hour of day), kWh consumed, and similar. As regulators and stewards, local governments would benefit from readily available and timely data that is specific enough to guide policy decisions. This data may include the number and location of publicly available EVSE installed under the pilot in their jurisdiction and other information that is not in contravention of the Companies’ North Carolina Code of Conduct or Commission Rules.

#### Limitation on Plug Types:

The Make Ready Credit filing specifies that certain EVSE plug types are required in order to be eligible for the credit (i.e., J1772), but the filing also states that the Make Ready Credit leaves EVSE options open to customers. Specifying certain plug types (i.e., J1772) may be a reasonable approach in the case of multifamily properties or publicly accessible chargers and may be reasonable under the EVSE tariff proposal.

However, it is overreaching in the case of customers utilizing only the Make Ready Credit at residential sites or limited access sites for fleets where the associated vehicles use a different plug type (e.g., Tesla or other proprietary plugs) as it will force the customers to utilize converters rather than direct connections.

Public Chargers--Access Requirements:

Some sites owned and operated by local governments, that may otherwise be ideal for public chargers, do not currently have 24/7 access for security purposes. Clarification on this requirement or specific exceptions to this requirement would help support local government participation in the public Level 2 charger pilot.

Public Chargers--Additional Allocation:

It may be the case that in order to achieve the companies' goals, particularly within the pilot program timeline, an additional number of EVSE ports beyond the 8 or 20 maximums stated in the filing should be allocated to existing partner parent customer entities after a certain amount of time has elapsed and if other customers have not requested EVSE at their sites.

Maintenance Conditions:

In the filing, Duke states, in relation to customer-operated EVSE units utilizing the EVSE tariff, that "The Company will readily maintain, as soon as practical, the EVSE during working hours (7 AM to 7 PM) following notification by the Customer." SSDN members believe that this is too vague of a commitment regarding timing of repairs or replacements in relation to the EVSE equipment that will be relied upon by fleets, individuals, and commercial customers to maintain use of critical vehicles. We recommend that Duke track and report on repair times during the pilot to help inform this aspect of a long-term program and whether additional guardrails and assurances are needed to protect customers.

School Bus Pilot--Emergency Protocols:

The vehicle-to-grid component of the EV School Bus program provides an opportunity to innovate in North Carolina. The proposal states that the control activities should not impact the "necessary duty cycle" of the buses. Similarly, in cases of anticipated power failure (e.g., due to storms) where a necessary emergency related use is anticipated, it is currently unclear whether the school district or Duke requirements have priority in terms of utilization of pre-charged batteries. We recommend that the school districts have priority and that it is explicitly stated.

Unforeseen Installation Costs:

The proposal does not clarify whether the companies will absorb unforeseen costs related to the installation of customer operated EVSE. This could impact customer decisions and should be clarified.

## **Conclusion**

In summary, SSDN commends Duke Energy for making this timely proposal before the Commission and believes that it is a step in the right direction if the concerns



mentioned above are addressed. We hope that it can build upon the ongoing success of the Phase I pilot programs and infrastructure being implemented in communities across North Carolina and the feedback provided in the ET Collaborative Stakeholders Process. As a regional organization, we also encourage Duke Energy and the Commission to evaluate the work and experience that utilities have already achieved in neighboring states in the Southeast, such as South Carolina and Virginia, so that we can start developing and designing more regional solutions for EV drivers who will inevitably cross both state and service territory boundaries.

The Southeast Sustainability Directors Network and our local government members have a history of partnering with Duke Energy on energy programs that benefit our residents, businesses, and local government operations. We are committed to collaboration and look forward to working with Duke Energy to enable the above solutions that we believe will accelerate a more affordable, clean, equitable, resilient, and reliable energy and transportation system. Through continued partnership, we can demonstrate to both North Carolinians and the nation what collaborative clean energy leadership looks like.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg J", with a long horizontal flourish extending to the right.

Meg Jamison  
Executive Director  
Southeast Sustainability Directors Network