



December 20, 2019

Kim Campbell  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4300  
Electronic Submission: [kcampbell@ncuc.net](mailto:kcampbell@ncuc.net)

Re: Dockets: E-2 Sub 1197 and E-7, Sub 1195

Dear Ms. Campbell,

The Natural Resources Defense Council (“NRDC”) submits this letter to support Duke Energy Progress (“DEP”) and Duke Energy Carolinas’ (“DEC”) efforts to electrify the transportation sector. The proposed transportation electrification pilot programs support Governor Cooper’s 2018 Executive Order 80, *North Carolina’s Commitment to Address Climate Change and Transition to a Clean Energy Economy*, which sets a goal to reduce greenhouse gas emissions by 40% from 2005 levels by 2025 and increase the number of zero emission vehicles in the Tar Heel State to 80,000 by 2025.

Transportation electrification is an important strategy to reduce greenhouse gas emissions, mitigate the effects of climate change, improve air quality, and improve North Carolinians’ health. Additionally, transportation electrification can reduce vehicle fueling and maintenance expenditures, as well as optimize the operation of the electrical grid, to the benefit of all North Carolinians. Active utility transportation electrification programs, such as those proposed in the DEP and DEC dockets, will help to ensure successful integration of electric vehicles (“EV”) into the grid and set the foundation to realize the full potential of vehicle electrification.

NRDC supports DEP and DEC’s proposed pilots, which represent the holistic approach needed to support the goals in Executive Order 80 and helps ensure the benefits of electrification extend beyond drivers who can charge their vehicles at home. As North Carolina will need over 4,000 public charging stations to support the anticipated 80,000 electric vehicles on the road by 2025, NRDC supports DEP and DEC’s efforts to expand charging station infrastructure, particularly if the infrastructure is sited in underserved areas.<sup>1</sup>

NRDC urges DEP and DEC to implement these programs in a manner that ensures low-and moderate-income customers, who are often most adversely affected by greenhouse gas emissions and climate change, experience the benefits of the proposed pilot programs.

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<sup>1</sup> EVI-Pro Lite, *United States Department of Energy*, accessed on December 16, 2019

NRDC encourages DEP and DEC to file additional programs that explore sustainable and smart rate design for additional use cases that further help to remove barriers for electric vehicle expansion, such as solutions to demand charges, managed charging at multi-family dwellings, and additional price signals that shift charging to off-peak hours.

Utilities and their regulators are uniquely positioned to help foster and grow the EV market. NRDC encourages the Commission to approve the DEP and DEC pilot program and direct the utilities to propose full-scale programs in the near term to help North Carolina meet its greenhouse gas, zero emission vehicle, and climate goals.

Sincerely,

Kathy Harris  
Clean Vehicles and Fuels Advocate  
NRDC, Climate & Clean Energy Program

Luis Martinez  
Director, Southeast Energy  
NRDC, Climate & Clean Energy Program