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Apr 30 2021

April 30, 2021

**VIA ELECTRONIC FILING**

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

**Re: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's  
Request for Approval of Make Ready Credit Programs  
Docket Nos. E-7, Sub 1195 and E-2, Sub 1197**

Dear Ms. Campbell:

Pursuant to the Commission's *Order Approving Electric Transportation Pilot, in Part* issued November 24, 2020 in the above-referenced dockets, enclosed for filing are Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Joint Request for Approval of Respective Make Ready Credit Programs.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Kendrick C. Fentress

Enclosure

cc: Parties of Record

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 Energy Carolinas,	)	<b>JOINT REQUEST BY DUKE</b>
LLC, and Duke Energy Progress, LLC, for	)	<b>ENERGY CAROLINAS, LLC AND</b>
Approval of Proposed Electric	)	<b>DUKE ENERGY PROGRESS, LLC</b>
Transportation Pilot	)	<b>FOR APPROVAL OF RESPECTIVE</b>
	)	<b>MAKE READY CREDIT</b>
	)	<b>PROGRAMS</b>
	)	

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NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, “Duke” or the “Companies”) by and through counsel, and, pursuant to the Commission’s November 24, 2020 *Order Approving Electric Transportation Pilot, In Part*, in the above-captioned Docket Nos. E-2, Sub 1197 and E-7, Sub 1195 (“*ET Order*”), hereby request approval of the attached, respective tariff-offering “Make Ready Credit” programs (“Make Ready Credit”) that will defray the cost of make ready infrastructure installed by customers to create the foundation necessary for electric vehicles (“EV”) programs and pilots. Put simply, the Companies’ Make Ready Credit programs support and align with:

- The Commission’s *ET Order* to establish a make ready program, which is similar to other distribution processes;
- The Governor’s Executive Order 80 to encourage EV adoption;
- North Carolina’s Clean Energy Plan to accelerate clean energy deployment which lowers CO2 emissions and creates economic opportunities for both rural and urban areas of the state;

- The need to ensure that the necessary new supporting electric infrastructure on a customer's premises is installed in a safe and reliable manner to protect both the customer's investment and the grid impacts resulting from this significant new load;
- Electrification of transportation for low- to moderate-income customers that otherwise may be delayed through burdensome up-front costs to install EV chargers and make ready infrastructure; and
- A framework to proactively manage the Companies' grid so they can address system upgrades that are necessary for wide-scale electrification.

In support thereof, the Companies respectfully show the Commission the following:

1. Duke Energy Progress, LLC's regional headquarters and general offices are located at 410 South Wilmington Street, Raleigh, North Carolina, and its mailing address is:

Duke Energy Progress, LLC.  
410 S. Wilmington Street NCRH 20  
Raleigh, North Carolina 27602

2. Duke Energy Carolinas, LLC's general offices are at 550 South Tryon Street, Charlotte North Carolina and its mailing address is:

Duke Energy Carolinas, LLC  
P.O. Box 1321 (DEC 45A)  
Charlotte, North Carolina 28202

3. The names and addresses of Companies' attorneys are:

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Copies of all pleadings, testimony, orders, and correspondence in this proceeding should be served upon the attorneys listed above.

4. The Companies are engaged in the generation, transmission, distribution, and sale of electricity at retail in the eastern, piedmont and western portions of North Carolina, and portions of South Carolina. Each Company serves more than 150,000 North Carolina retail customers as of January 1, 2017. The Companies also sell electricity at wholesale to many municipal, cooperative, and investor-owned electric utilities. The Companies are authorized to transact business in the State of North Carolina and are public utilities under the laws of the State of North Carolina. Accordingly, their operations in the State of North Carolina are subject to the jurisdiction of the Commission.

#### **BACKGROUND**

5. On March 29, 2019, the Companies filed an Application for Approval of a Proposed Electric Transportation Program (“2019 Application”). The Companies’ filing was intended to address the growing and evolving EV market in North Carolina. As the 2019 Application detailed, the growth rate at that time in the availability of light-duty passenger EVs since 2012 had been enormous: as of December 2018, there were over 40

EV models available for purchase in the light-duty passenger vehicle class in the United States, an 800% increase from the mere five EV models that were available in 2011.<sup>1</sup> At the conclusion of 2018, Governor Cooper had issued Executive Order 80, North Carolina’s Commitment to Address Climate Change and Transition to a Clean Energy Economy, wherein he directed that the State of North Carolina will “strive to accomplish” increasing the number of registered, zero-emission vehicles to at least 80,000 by 2025. Additionally, the North Carolina Department of Environmental Quality Energy Policy Council recommended that the State adopt measures and implement programs that promote EV adoption and ease the transition to an electrified transportation economy for all. The Energy Policy Council further urged consideration by elected officials and regulatory agencies of measures intended to address perceived barriers to EV deployment.<sup>2</sup> In sum, the Companies’ 2019 Application stated their belief that more investment in EV charging infrastructure will accelerate EV adoption in the State, consistent with the intent of these State policies and the fast-developing EV market.<sup>3</sup>

6. On November 24, 2020, the Commission issued its *ET Order*, in which it recognized the “general agreement that there are many potential benefits to electric ratepayers and society at large in the transition from gasoline- and diesel-powered vehicles to electric transportation. . . . [and that] there are still many challenges to widespread adoption of EVs, some of which are tied to the lack of charging infrastructure.” *ET Order* at 16. The Commission approved the 2019 Application in part but directed that the

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<sup>2</sup> North Carolina Department of Environmental Quality, Energy Policy Council, Biennial Report, issued May 2018, at p. 77 – 78, available at <https://deq.nc.gov/about/divisions/energy-mineral-landresources/energy-policy-council> (“Energy Policy Council Report”)

<sup>3</sup> See Energy Policy Council Report at 78 (Explaining that EV adoption will not happen in a vacuum).

Companies and the Public Staff of the North Carolina Utilities Commission (“Public Staff”) convene a collaborative stakeholder process to provide input and feedback on potential future pilot programs.<sup>4</sup>

7. The Commission’s *ET Order* also provided the following:

The Commission further directs Duke to explore and create a second pilot for these three programs in a stakeholder process . . . The Commission expects Duke to explore in the second round of these three pilot programs and any other proposed program additional ownership and stations co-owned, co-funded, or co-operated with Duke in partnership with other entities.

*ET Order* at 19-20. The Commission further directed the Companies to consider a “Make-ready Approach” wherein they would “leverage familiarity with permitting requirements, the interconnection process, and the design, operations, and maintenance of the distribution system to efficiently identify and develop appropriate preparations for EV infrastructure.” *Id.* at 21. The Commission had noted in its *ET Order* that the North Carolina Sustainable Energy Association (“NCSEA”) had filed comments opposing the 2019 ET Application and recommending the Commission instead direct Duke to file a proposal for a “make-ready” program. *ET Order* at 8. NCSEA’s initial comments stated that:

a make-ready program would provide electrical service to the point where a charging station could be installed. Such a program would be consistent with Duke’s line extension policies that have been approved by the Commission.

NCSEA’s Initial Comments at 12.

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<sup>4</sup> The Companies and the Public Staff convened this collaborative stakeholder process, which included the parties to these dockets, but also numerous other interested stakeholders representing and/or interested in all facets of the transforming and evolving ET market. The participating collaborative stakeholders (“ET Stakeholder Group”) have met numerous times, and the process remains ongoing.

8. In compliance with the Commission's directives, the Companies have developed the proposed, attached Make Ready Credit programs for DEC (Electric Vehicle Make Ready Infrastructure Program (NC), Attachment A) and DEP (Electric Vehicle Make Ready Infrastructure Program MREV-1 (NC), Attachment B). The Companies have developed and shared this proposal with the ET Stakeholder Group over the past two stakeholder meetings on March 22, 2021 and April 15, 2021. To be clear, these are not pilot programs. Rather, these offerings are prepared for full commercialization as they will lay the necessary foundation for transitioning to the increased EV adoption and infrastructure envisioned by the Commission in the *ET Order* and will complement the Companies' Second Phase Pilot proposals, due May 24, 2021. Additionally, unlike the Companies' currently approved EV pilots and future EV Pilots, the Make Ready Credit will be available to all customers regardless of their desired of ownership and operation model. In other words, the Make Ready Credit will encourage and support customer adoption of EVs across market segments as well as the development of a competitive market for charging infrastructure beyond the Companies' EV pilots.

9. As suggested by NCSEA in its initial comments and the Commission in its ET Order, the Make Ready Credit has been designed to leverage the Companies' experience with distribution system expansion and work in a very similar way to the revenue credit offerings in the Companies' Line Extension Policies. The Companies' successful Line Extension Policies have been in place for decades and provide three to five years' worth of credits to customers to defray the infrastructure cost of adding new load. This benefits the new customer and in the long run also benefits existing customers by reducing the per unit cost of electricity for all. Based on the success of this long-standing

and balanced policy, the Make Ready Credit design follows the Companies' Line Extension Plans as closely as possible<sup>5</sup>. The Make Ready Credit program provides credits based on increased revenue from EV charging for the first three to five years after an installation, just as the Line Extension Plan provides a revenue-based credit over the same time frame where infrastructure enables a customer to join the DEC or DEP system. As designed, the Make Ready Credit will encourage residential and non-residential customers to invest in working upgrades to existing structures while also delivering a benefit to all utility customers by lowering the per unit cost of electricity.

10. The Make Ready Credit programs are structured so that they can support, on a level basis, Company-owned, customer-owned, or third-party owned EV charging equipment. By defraying the cost of make ready infrastructure without regard to ownership of the charging station, the Make Ready Credit programs can provide a durable foundation for a variety of EV programs regardless of how the industry and cost structures may change over time. If the costs of make ready infrastructure installations decline over time, this would in turn cap the revenue credits. If a particular charging station ownership model takes hold, the make ready infrastructure program is there to provide support. The programs' design builds upon the experience and design of other successful EV make ready infrastructure programs, including in New York (State program)<sup>6</sup>, California

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<sup>5</sup> See *Order Approving Distribution Line Extension Plan*, Docket No. E-7, Sub 1119, Oct. 5, 2016 and *Order Approving Line Extension Plan*, Docket No. E-2, Sub 1053, Nov. 29, 2016 (Most recent Commission orders approving DEC's and DEP's, respectively, Line Extension Plans).

<sup>6</sup> State of New York Public Service Commission, *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Program*, Case 18-E-0138 (July 16, 2020) . A copy of the New York order is available here:

<http://documents.dps.ny.gov/public/MatterManagement/MatterFilingItem.aspx?FilingSeq=249404&MatterSeq=56005>. An errata notice was issued on November 3, 2020, and is available here: <http://documents.dps.ny.gov/public/MatterManagement/MatterFilingItem.aspx?FilingSeq=255231&MatterSeq=56005>

(Southern California Edison)<sup>7</sup>, Arizona (Tucson Electric Power)<sup>8</sup>, and Georgia (Georgia Power)<sup>9</sup>, while also reflecting long experience with the North Carolina distribution line extension programs.

### DESCRIPTION OF MAKE READY CREDIT PROGRAM

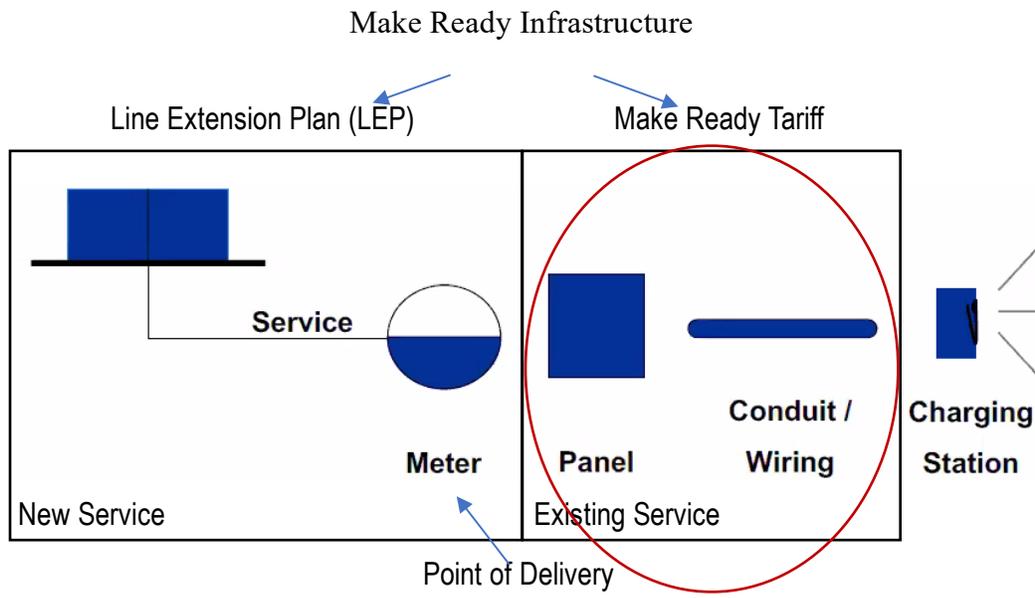
11. As a threshold matter, the Companies define their Make Ready Credit Programs as referring to the infrastructure necessary to make a location ready for installation of the Electric Vehicle Supply Equipment (“EVSE”), including the cost of investments in the safe and reliable installation of wiring and other upgrades that support EV charging, but excluding the cost of the charging station itself (Make Ready Infrastructure). In other words, the Make Ready Credit is designed to defray installation costs associated with EV chargers to encourage mutually beneficial EV adoption. The diagram below illustrates a visual example of the Line Extension Policies and the Make Ready Credit:

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<sup>7</sup> Public Utilities Commission of the State of California, *Decision Authorizing Southern California Edison Company’s Charge Ready 2 Infrastructure and Market Education Programs*, Application 18-06-015 (August 27, 2020). A copy of the California order is available here: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M346/K230/346230115.PDF>.

<sup>8</sup> Arizona Corporation Commission, *In re: Application of Tucson Electric Power Company for Approval of its 2018 Energy Efficiency Implementation Plan and for a Waiver under A.A.C. R14-2-2419*, Docket No. E-1933A-17-0250 (February 20, 2019). A copy of the order is available here: <https://docket.images.azcc.gov/0000196175.pdf?i=1609869794990>.

<sup>9</sup> Georgia Public Service Commission, *In re: Georgia Power Company’s 2019 Rate Case*, Docket No. 42516 (December 17, 2019). A copy of the order is available here: <https://psc.ga.gov/search/facts-document/?documentId=179856>.



12. Akin to the revenue credit approach in the Companies’ Line Extension Policies, under the Make Ready Credit, revenue credit levels for customers will be generally based on estimates of the aggregate increase in electric revenue for the first three to five years following installation of newly installed EVSE.

13. The following provides an illustration of the proposed Make Ready Credit program offering:

**EV MAKE-READY PROGRAM**

	Residential (Retrofit)	Non-Residential (Retrofit)	Homebuilder (Res New Const.)
Revenue Credit Level	Based on 5 years* of estimated revenue	Based on 3 years* of est. revenue 5 years* for MFD and Housing Authority	Fixed credit per home
Credit Determination	Based on publicly-available data as to typical residential EV charging	Company and Customer develop a Customer Usage Profile based on estimated use of each station	Fixed; based on estimated labor and materials
Installer	Pre-Approved Contractor**, Licensed Contractor	Licensed Contractor	Construction Company Pre-Approved by Duke
Key Documentation Required	Install Invoices, EV Registration, permits	Install Invoices, Customer Usage Profile, permits, Schematic diagram (in some circumstances)	Evidence of installation

\* If Customer is simultaneously participating in the Line Extension Plan, credits are based on one-two years of estimated revenue.  
 \*\* When using a Pre-Approved Contractor, the Contractor can receive credit directly and build into quoted price to customer.



14. Additionally, similar to the Companies’ Line Extension Policies, the Make Ready Credit will allow for investments to be made in customer-sited enabling infrastructure, excluding the EV charger, to serve load from EVs. It will align cost allocation of investments with future revenue. The Customer may obtain installation through a licensed and approved contractor.

15. As the attached Tariffs provide, Make Ready Credit is available to residential and non-residential customers, at their premises/places of business, that require Level 2 or higher EVSE and related wiring and circuitry. The residential customer may receive revenue credits for Make Ready infrastructure through a reduction in the price charged by a Contractor that has been approved by the Company (Contractor Credit Option) or through a direct application submitted to the Company by the customer (Customer Credit Option). For the Contractor Credit Option, the customer seeking installation of the EVSE and Make Ready infrastructure at his or her premises selects a Contractor that has been approved by the Company for participation in this Program. The

list of approved contractors will be available on the Company's website. The Contractor is then responsible for including the Make Ready infrastructure revenue credits in the price quoted to the customer for Make Ready Infrastructure installation.

16. Under the Customer Credit option, the residential customer must file an application on the Company's website requesting participation under this Program. The application will require the Customer to provide, among other information: (i) detailed invoices from the Contractor for Make Ready Infrastructure, (ii) a copy of the approved permit from the municipal or local permitted authority; (iii) summary of any grant funding received as part of the project and, for residential customers, and (iv) evidence of EV registration. The sum of the costs for the Make Ready Infrastructure are "Demonstrated Costs" subject to revenue crediting, provided, however, that "Demonstrated Costs" shall not include any amounts for which the customer expects coverage or reimbursement from a third-party funding source.

17. To be eligible for the Make Ready Credit, the application for a residential customer must be filed within 120 days following the later of: (1) the date on the most recent invoice included with the application; or (2) the date of EV registration. Under either credit option described above, the customer must acknowledge that a Company representative may, with reasonable advance notice, access the customer's EVSE installation to verify confirmation with the terms of the program.

18. After the Company receives and reviews an application for completeness, it will, subject to the terms and conditions of the program, provide a Make Ready Infrastructure revenue credit through the Contractor, under the Contractor Credit Option, or to the residential customer, through the Customer Credit Option, in the amount of the

Demonstrated Costs or the Company's expected increase in revenue in the first five years following the customer's EVSE installation, whichever is less. For a customer who is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Make Ready Infrastructure revenue credits will be Demonstrated Costs or the Company's expected increase in revenue in the first year following the customer's EVSE installation, whichever is less.

19. The program terms for non-residential customers are similar, although all revenue credits are directed to the customer (there is no Contractor Credit Option), and there is no EV registration requirement for non-residential customers because such installations may be facilitating the charging of EVs owned by others. With a few such exceptions, the above terms and conditions and application requirements apply also to non-residential customers, but to be eligible for revenue credits, the Make Ready Credit tariffs provide that non-residential customers must complete a Customer Usage Profile form, which will be made available on the respective Company's website. Non-residential customers will provide information on the estimated uses of each EVSE, including hours of usage per day and per week and the timing of installation. This information will facilitate the revenue credit calculations for non-residential customers based on three years of EV charging revenue.

20. To provide an additional incentive to promote EV adoption in high density areas and/or low-income areas with fewer single family homes, and to ensure equitable opportunities, the tariffs include a proposal that for EV charging installations by owners or managers of Multi-Family Dwellings or by Housing Authorities, the revenue crediting will

be reflect five years of revenue--the same period as the revenue credit for a single family homeowner.

21. The Companies shall also, in each Company's sole discretion, provide a Make Ready Infrastructure incentive of \$150.00 to a homebuilder approved by the Company for participation in this Program, if that homebuilder is constructing a home served by the Company's distribution system where the homebuilder demonstrates, through an application and documentation satisfactory to the Company, that it has installed Make Ready Infrastructure in a convenient location for residential EV charging.

22. Finally, as EVSE is installed on the customer's side of the meter, electric usage will be billed under the customer's selection of rate schedule and other riders, if applicable. To continue to learn more about customers' energy usage with EVs so that the Companies can continue to facilitate the goals of Executive Order 80 and better serve their customers, the Companies retain the right to install, at the Company's expense, metering and load research devices it deems appropriate to collect customer data about the usage characteristics of the EVSE.

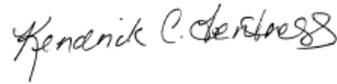
23. As noted, the Companies shared their proposal for the Make Ready Credit Programs with the ET Stakeholder Group prior to filing it with the Commission. To ensure continued transparency about these programs with the ET Stakeholders, the Public Staff, and the Commission itself, the Companies will commit to reporting on the progress of the Make Ready Credit programs, including how many customers served, on an annual basis.

### **CONCLUSION**

Based on the foregoing, the Companies respectfully request approval of the Make Ready Credit programs as set forth in DEC's Electric Vehicle Make Ready Infrastructure

Program (NC) and DEP's Electric Vehicle Make Ready Infrastructure Program MREV-1(NC).

Respectfully submitted, this the 30<sup>th</sup> day of April 2021.



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*ATTORNEYS FOR DUKE ENERGY  
PROGRESS, LLC AND DUKE ENERGY  
CAROLINAS, LLC*

ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM (NC)PURPOSE

The purpose of this Program is to support adoption of electric vehicles (EVs) and EV charging by customers through revenue credits that defray a portion of EV “make ready” expenses. Make ready expenses include the cost of investments in the safe and reliable installation of wiring and other upgrades that support EV charging (Make Ready Infrastructure) but exclude the cost of the equipment and charging station (called “electric vehicle supply equipment” (EVSE)) that directly supplies the energy to the EV. The Program also provides fixed incentives to approved homebuilders installing Make Ready Infrastructure into newly-constructed homes.

AVAILABILITY (North Carolina Only)

This Program is available on a voluntary basis to reduce costs for the installation, at the customer’s premises, of Make Ready Infrastructure that supports Level 2 or higher EVSE that is customer-owned, third-party owned, or Company-owned. The Company will not own the Make Ready Infrastructure.

The Program is also available to homebuilders approved by the Company and in accordance with the terms herein, as stated in the “Homebuilder Incentives” section.

Participation in the Program is available as to Make Ready Infrastructure installed on and after the effective date of this Program.

To be eligible for revenue credits under this Program, each Level 2 EVSE installed at the customer’s premises must feature at least one SAE J1772 charging plug and each Level 3 (DC Fast Charging) EVSE installed at the customer’s premises must feature at least one SAE J1772 CCS1 charging plug.

The work to install Make Ready Infrastructure must be performed by a licensed electrician or a business employing licensed electricians (Contractor).

APPLICATION REQUIREMENTS AND REVENUE CREDITS FOR RESIDENTIAL CUSTOMERS

A residential customer may receive revenue credits for Make Ready Infrastructure either through a reduction in the price charged by a Contractor that has been approved by the Company (Contractor Credit Option) or through a direct application submitted to the Company by the customer (Customer Credit Option). Except as noted below, revenue credit levels for residential customers are based on estimates of the aggregate increase in electric revenue for the first five years following installation of newly-installed EVSE (akin to the revenue credit approach in the Company’s Distribution Line Extension Plan).

Under the Contractor Credit Option, the customer seeking installation of EVSE and Make Ready Infrastructure at the customer’s premises selects a Contractor that has been approved by the Company for participation in this Program. A list of such approved Contractors is available on the Company’s website. The Contractor must contact the Company to determine the customer’s Make Ready Infrastructure revenue credits based on information provided by the customer. The Contractor is then responsible for including the Make Ready Infrastructure revenue credits in the price quoted to the customer for Make Ready Infrastructure installation. The customer is responsible for providing the Contractor with evidence of EV registration.

Under the Customer Credit Option, the customer must file an application on the Company’s website requesting participation in this Program. The application will require the customer to provide, among other information:

1. Detailed invoice(s) from the Contractor for Make Ready Infrastructure. Each invoice from the Contractor must include separate line items for labor and materials and the Contractor’s name, address, and telephone number;
2. A copy of the approved permit from the municipal or local permitting authority; and
3. Evidence of EV registration.

The sum of the costs for Make Ready Infrastructure stated in the invoice(s) submitted with the application are considered the “Demonstrated Costs” subject to revenue crediting; provided, however, that “Demonstrated Costs” shall not include any amounts for which the customer expects coverage or reimbursement from a third-party funding source. It is not the intention of this Program to provide revenue credits to defray expenses for which the customer expects third-party funding. To be eligible for revenue credits

**ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM (NC)**

under this Program, the application must be filed within 120 days following the latter of: (1) the date on the most recent invoice included with the application; or (2) the date of EV registration.

Under either the Contractor Credit Option or the Customer Credit Option, the customer must acknowledge that a Company representative may, with reasonable advance notice, access the customer's EVSE installation to verify compliance with the terms of this Program.

After the Company receives and reviews an application for completeness, including but not limited to the submission of items 1-3 listed above, as applicable, the Company will, subject to the terms and conditions of this Program, provide Make Ready Infrastructure revenue credits through the Contractor, under the Contractor Credit Option, or to the customer, under the Customer Credit Option, in the amount of the Demonstrated Costs or the Company's expected increase in revenue in the first five years following the customer's EVSE installation, whichever is less; provided, however, that for such a customer who is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Make Ready Infrastructure revenue credits will be the Demonstrated Costs or the Company's expected increase in revenue in the first year following the customer's EVSE installation, whichever is less.

Where an application involves installation of multiple EVSEs, the expected increase in revenue will be determined for each EVSE for the applicable number of years stated above and summed, and this sum will be compared to the Demonstrated Costs. The revenue credits for such application are to be based on such sum of the expected increase in revenue from the multiple EVSEs, but are not to exceed the Demonstrated Costs.

**APPLICATION REQUIREMENTS AND REVENUE CREDITS FOR NON-RESIDENTIAL CUSTOMERS**

To be eligible for revenue credits under this Program, a non-residential customer must complete a Customer Usage Profile form, using a template provided by the Company on the Company's website, indicating the estimated uses of each EVSE, including hours of usage per day and per week and the proposed timing of installation.

Except as noted below, revenue credit levels for non-residential customers are based on estimates of the aggregate increase in electric revenue for the first three to five years following installation of newly-installed EVSE (akin to the revenue credit approach in the Company's Distribution Line Extension Plan).

The customer must file an application on the Company's website requesting participation in this Program. The application will require the customer to provide, among other information:

1. Detailed invoice(s) from the Contractor for Make Ready Infrastructure. Each invoice from the Contractor must include separate line items for labor and materials and the Contractor's name, address, and telephone number;
2. For all installations involving installation of more than one EVSE or Level 3 or higher EVSE, a schematic diagram of the installation;
3. A copy of the approved permit from the municipal or local permitting authority; and
4. A completed Customer Usage Profile form.

The application must be filed within 120 days following the latter of: (1) the date on the most recent invoice included with the application; or (2) the date listed on the approved permit.

The sum of the costs for Make Ready Infrastructure stated in the invoice(s) submitted with the application are considered the "Demonstrated Costs" subject to revenue crediting; provided, however, that "Demonstrated Costs" shall not include any amounts for which the customer expects coverage or reimbursement from a third-party funding source. It is not the intention of this Program to provide revenue credits to defray expenses for which the customer expects third-party funding.

The customer must acknowledge that a Company representative may, with reasonable advance notice, access the customer's EVSE installation to verify compliance with the terms of this Program.

**ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM (NC)**

After the Company receives and reviews an application for completeness, including but not limited to the submission of items 1-4 listed above, as applicable, the Company will, subject to the terms and conditions of this Program, provide Make Ready Infrastructure revenue credits to the customer in accordance with the following standards:

- A. Multi-Family Dwellings and Housing Authorities. For a non-residential customer applicant that is an owner or property manager of a building or complex with four or more housing units (Multi-Family Dwelling or MFD), or a public entity that provides housing targeted toward low-income and moderate-income residents that is seeking to provide EV charging access to a property or properties that contains four or more housing units (Housing Authority or HA), and where the customer demonstrates that all EVSEs will be accessible to residents of the MFD or HA and installed for the primary use of such residents, the Company will determine a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first five years of operation, with the revenue credits not to exceed the Demonstrated Costs; provided, however, that for such a non-residential customer that is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Company will develop a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first two years following installation, with the Make Ready Infrastructure revenue credits not to exceed the Demonstrated Costs; or
- B. Non-Residential Customers other than MFDs and HAs. For all other non-residential customer applicants, the Company will determine a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first three years of operation, with the revenue credits not to exceed the Demonstrated Costs; provided, however, that for such a non-residential customer that is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Company will develop a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first year following installation, with the Make Ready Infrastructure revenue credits not to exceed the Demonstrated Costs.

Where an application involves installation of multiple EVSEs, the expected increase in revenue will be determined for each EVSE for the applicable number of years stated above and summed, and this sum will be compared to the Demonstrated Costs. The revenue credits for such application are to be based on such sum of the expected increase in revenue from the multiple EVSEs, but are not to exceed the Demonstrated Costs.

HOMEBUILDER INCENTIVES

The Company shall, in its sole discretion, provide a Make Ready Infrastructure incentive to a homebuilder approved by the Company for participation in this Program that is constructing a home served by the Company's distribution system where the homebuilder demonstrates, through an application and documentation satisfactory to the Company, that it has installed Make Ready Infrastructure in a convenient location for residential EV charging. Any such application must be submitted during the construction of the home and at least 30 days prior to the move-in date of the homeowner. The amount of such homebuilder incentive shall not exceed \$150 per home.

BILLING RATE

EVSE shall be installed for participating customers on the customer's side of Company's meter; therefore, any electric usage will be billed under the customer's selection of rate schedule and other riders, if applicable.

METERING REQUIREMENTS

For participating customers, Company shall have the right to install, at the Company's own expense, metering and load research devices as it deems appropriate to collect customer data about the usage characteristics of the EVSE.

ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM (NC)

GENERAL

Services and offerings under this Program are subject to the authority of the North Carolina Utilities Commission.

Duke Energy Progress, LLC  
(North Carolina only)

ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM MREV-1 (NC)

PURPOSE

The purpose of this Program is to support adoption of electric vehicles (EVs) and EV charging by customers through revenue credits that defray a portion of EV “make ready” expenses. Make ready expenses include the cost of investments in the safe and reliable installation of wiring and other upgrades that support EV charging (Make Ready Infrastructure) but exclude the cost of the equipment and charging station (called “electric vehicle supply equipment” (EVSE)) that directly supplies the energy to the EV. The Program also provides fixed incentives to approved homebuilders installing Make Ready Infrastructure into newly-constructed homes.

AVAILABILITY (North Carolina Only)

This Program is available on a voluntary basis to reduce costs for the installation, at the customer’s premises, of Make Ready Infrastructure that supports Level 2 or higher EVSE that is customer-owned, third-party owned, or Company-owned. The Company will not own the Make Ready Infrastructure.

The Program is also available to homebuilders approved by the Company and in accordance with the terms herein, as stated in the “Homebuilder Incentives” section.

Participation in the Program is available as to Make Ready Infrastructure installed on and after the effective date of this Program.

To be eligible for revenue credits under this Program, each Level 2 EVSE installed at the customer’s premises must feature at least one SAE J1772 charging plug and each Level 3 (DC Fast Charging) EVSE installed at the customer’s premises must feature at least one SAE J1772 CCS1 charging plug.

The work to install Make Ready Infrastructure must be performed by a licensed electrician or a business employing licensed electricians (Contractor).

APPLICATION REQUIREMENTS AND REVENUE CREDITS FOR RESIDENTIAL CUSTOMERS

A residential customer may receive revenue credits for Make Ready Infrastructure either through a reduction in the price charged by a Contractor that has been approved by the Company (Contractor Credit Option) or through a direct application submitted to the Company by the customer (Customer Credit Option). Except as noted below, revenue credit levels for residential customers are based on estimates of the aggregate increase in electric revenue for the first five years following installation of newly-installed EVSE (akin to the revenue credit approach in the Company’s Distribution Line Extension Plan).

Under the Contractor Credit Option, the customer seeking installation of EVSE and Make Ready Infrastructure at the customer’s premises selects a Contractor that has been approved by the Company for participation in this Program. A list of such approved Contractors is available on the Company’s website. The Contractor must contact the Company to determine the customer’s Make Ready Infrastructure revenue credits based on information provided by the customer. The Contractor is then responsible for including the Make Ready Infrastructure revenue credits in the price quoted to the customer for Make Ready Infrastructure installation. The customer is responsible for providing the Contractor with evidence of EV registration.

ELECTRIC VEHICLE MAKE READY  
INFRASTRUCTURE PROGRAM MREV-1 (NC)

Under the Customer Credit Option, the customer must file an application on the Company's website requesting participation in this Program. The application will require the customer to provide, among other information:

1. Detailed invoice(s) from the Contractor for Make Ready Infrastructure. Each invoice from the Contractor must include separate line items for labor and materials and the Contractor's name, address, and telephone number;
2. A copy of the approved permit from the municipal or local permitting authority; and
3. Evidence of EV registration.

The sum of the costs for Make Ready Infrastructure stated in the invoice(s) submitted with the application are considered the "Demonstrated Costs" subject to revenue crediting; provided, however, that "Demonstrated Costs" shall not include any amounts for which the customer expects coverage or reimbursement from a third-party funding source. It is not the intention of this Program to provide revenue credits to defray expenses for which the customer expects third-party funding. To be eligible for revenue credits under this Program, the application must be filed within 120 days following the latter of: (1) the date on the most recent invoice included with the application; or (2) the date of EV registration.

Under either the Contractor Credit Option or the Customer Credit Option, the customer must acknowledge that a Company representative may, with reasonable advance notice, access the customer's EVSE installation to verify compliance with the terms of this Program.

After the Company receives and reviews an application for completeness, including but not limited to the submission of items 1-3 listed above, as applicable, the Company will, subject to the terms and conditions of this Program, provide Make Ready Infrastructure revenue credits through the Contractor, under the Contractor Credit Option, or to the customer, under the Customer Credit Option, in the amount of the Demonstrated Costs or the Company's expected increase in revenue in the first five years following the customer's EVSE installation, whichever is less; provided, however, that for such a customer who is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Make Ready Infrastructure revenue credits will be the Demonstrated Costs or the Company's expected increase in revenue in the first year following the customer's EVSE installation, whichever is less.

Where an application involves installation of multiple EVSEs, the expected increase in revenue will be determined for each EVSE for the applicable number of years stated above and summed, and this sum will be compared to the Demonstrated Costs. The revenue credits for such application are to be based on such sum of the expected increase in revenue from the multiple EVSEs, but are not to exceed the Demonstrated Costs.

APPLICATION REQUIREMENTS AND REVENUE CREDITS FOR NON-RESIDENTIAL CUSTOMERS

To be eligible for revenue credits under this Program, a non-residential customer must complete a Customer Usage Profile form, using a template provided by the Company on the Company's website, indicating the

ELECTRIC VEHICLE MAKE READY  
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estimated uses of each EVSE, including hours of usage per day and per week and the proposed timing of installation.

Except as noted below, revenue credit levels for non-residential customers are based on estimates of the aggregate increase in electric revenue for the first three to five years following installation of newly-installed EVSE (akin to the revenue credit approach in the Company's Distribution Line Extension Plan).

The customer must file an application on the Company's website requesting participation in this Program. The application will require the customer to provide, among other information:

1. Detailed invoice(s) from the Contractor for Make Ready Infrastructure. Each invoice from the Contractor must include separate line items for labor and materials and the Contractor's name, address, and telephone number;
2. For all installations involving installation of more than one EVSE or Level 3 or higher EVSE, a schematic diagram of the installation;
3. A copy of the approved permit from the municipal or local permitting authority; and
4. A completed Customer Usage Profile form.

The application must be filed within 120 days following the latter of: (1) the date on the most recent invoice included with the application; or (2) the date listed on the approved permit.

The sum of the costs for Make Ready Infrastructure stated in the invoice(s) submitted with the application are considered the "Demonstrated Costs" subject to revenue crediting; provided, however, that "Demonstrated Costs" shall not include any amounts for which the customer expects coverage or reimbursement from a third-party funding source. It is not the intention of this Program to provide revenue credits to defray expenses for which the customer expects third-party funding.

The customer must acknowledge that a Company representative may, with reasonable advance notice, access the customer's EVSE installation to verify compliance with the terms of this Program.

After the Company receives and reviews an application for completeness, including but not limited to the submission of items 1-4 listed above, as applicable, the Company will, subject to the terms and conditions of this Program, provide Make Ready Infrastructure revenue credits to the customer in accordance with the following standards:

- A. Multi-Family Dwellings and Housing Authorities. For a non-residential customer applicant that is an owner or property manager of a building or complex with four or more housing units (Multi-Family Dwelling or MFD), or a public entity that provides housing targeted toward low-income and moderate-income residents that is seeking to provide EV charging access to a property or properties that contains four or more housing units (Housing Authority or HA), and where the customer demonstrates that all EVSEs will be accessible to residents of the MFD or HA and installed for the primary use of such residents, the Company will determine a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first five years of operation, with the revenue credits not to exceed the

ELECTRIC VEHICLE MAKE READY  
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- Demonstrated Costs; provided, however, that for such a non-residential customer that is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Company will develop a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first two years following installation, with the Make Ready Infrastructure revenue credits not to exceed the Demonstrated Costs; or
- B. Non-Residential Customers other than MFDs and HAs. For all other non-residential customer applicants, the Company will determine a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first three years of operation, with the revenue credits not to exceed the Demonstrated Costs; provided, however, that for such a non-residential customer that is simultaneously participating in the Company's Distribution Line Extension Plan and eligible for revenue credits under such Plan that account for the anticipated EV charging load, the Company will develop a Make Ready Infrastructure revenue credit amount based on the completed Customer Usage Profile form and the expected increase in revenue to be achieved through such usage for the first year following installation, with the Make Ready Infrastructure revenue credits not to exceed the Demonstrated Costs.

Where an application involves installation of multiple EVSEs, the expected increase in revenue will be determined for each EVSE for the applicable number of years stated above and summed, and this sum will be compared to the Demonstrated Costs. The revenue credits for such application are to be based on such sum of the expected increase in revenue from the multiple EVSEs, but are not to exceed the Demonstrated Costs.

HOMEBUILDER INCENTIVES

The Company shall, in its sole discretion, provide a Make Ready Infrastructure incentive to a homebuilder approved by the Company for participation in this Program that is constructing a home served by the Company's distribution system where the homebuilder demonstrates, through an application and documentation satisfactory to the Company, that it has installed Make Ready Infrastructure in a convenient location for residential EV charging. Any such application must be submitted during the construction of the home and at least 30 days prior to the move-in date of the homeowner. The amount of such homebuilder incentive shall not exceed \$150 per home.

BILLING RATE

EVSE shall be installed for participating customers on the customer's side of Company's meter; therefore, any electric usage will be billed under the customer's selection of rate schedule and other riders, if applicable.

METERING REQUIREMENTS

For participating customers, Company shall have the right to install, at the Company's own expense, metering and load research devices as it deems appropriate to collect customer data about the usage

ELECTRIC VEHICLE MAKE READY  
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characteristics of the EVSE.

GENERAL

Services and offerings under this Program are subject to the authority of the North Carolina Utilities Commission.

Effective for services rendered on and after \_\_\_\_\_  
NCUC Docket No. E-2, Sub 1197

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Joint Request for Approval of Respective Make Ready Credit Programs, in Docket Nos. E-7, Sub 1195 and E-2, Sub 1197, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1<sup>st</sup> Class Postage Prepaid, properly addressed to parties of record.

This the 30<sup>th</sup> day of April, 2021.



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