

May 6, 2019

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

RE: DOCKETS: E-2, Sub 1197 and E-7, Sub 1195

Dear Ms. Jarvis,

On behalf of the Southeast Energy Efficiency Alliance (SEEA), we ask that you file this letter for **Dockets E-2, Sub 1197 and E-7, Sub 1195** in which we express our strong support for Duke Energy Progress and Duke Energy Carolinas proposed electric transportation pilot in North Carolina. SEEA is a 501(c)(3) organization that promotes energy efficient solutions for a cleaner environment, a more prosperous economy, and a higher quality of life in the southeastern region of the United States. Energy efficient transportation is a critical element to achieving those goals.

We strongly support the objectives of the seven pilot programs identified and believe that these programs are appropriate targets for the utility to develop. These programs will provide North Carolinians and those traveling through Duke Energy's territory to increase driver confidence and enhance the companies' service offerings. Not only will drivers and Duke Energy customers benefit, but these programs will help the company keep pace with the increasing demand for the expansion of transportation electrification and support the state's Zero Emissions Vehicle (ZEV) goals for individual consumers, businesses and fleets.

We believe that all the pilot programs are well designed, in line in scope and size to NC's ZEV goals, and constitute a great step toward meeting the infrastructure gaps in North Carolina between the expected introduction of electric vehicles (EVs) over the next five to ten years, and the lack of plans for deployment of adequate EV infrastructure, which serve the public. We believe the total expected expenditures for these programs demonstrate leadership and an important commitment to supporting the transition to vehicle electrification by the utility. For residential customers, Duke intends to offer a rebate to customers who wish to install EVSE at their homes, but will also collect the vital charging data on the location, time, voltage, and other information important for the reliable operation of the distribution grid. During this pilot phase, it is important to both monitor the changes in consumer behavior regarding the time at which they charge for the benefit of the EV owners, but also provide Duke, as the grid operator, the necessary information to manage these increased loads and enhance efficient utilization of the distribution assets.

We also strongly support the pilot's program for the expansion of electric fleets, school buses and transit buses and associated charging. The transportation sector is now the top source of harmful air emissions with heavy-duty fleets a significant contributor of toxic diesel emissions. Transitioning to electric options will reduce these emissions and lower costs for these fleets. Supporting the expansion of electric fleets offers the opportunity for larger scale transportation emissions reductions and supporting the state's climate goals.

In addition, we strongly support Duke's proposal to deploy a combined 120 DC fast chargers throughout the state, primarily on highway corridors. We believe it is important for a utility, like Duke, to adopt a portfolio approach of charging infrastructure to test and assess how EV owners and consumers will actually use it, and to be able to spread the costs out in aggregate among these different assets over time. Most consumer surveys have shown that range

anxiety is the major impediment to greater adoption and purchase of EVs. While consumers may realize that most of the charging will be done at home (or the workplace if they have that benefit through their employers and spaces are available), but they are anxious of losing battery power, leaving them stranded on the side of the highway. Duke's proposal with appropriately-sited DC fast charging stations throughout the state should be able to test that concern, and address range anxiety.

We also support the utility's proposed owner operator model for this pilot. While we believe competition is important to this industry, the utility has an important role in developing this infrastructure and helping grow the market. For the purposes of this pilot, we believe that it is important that they gain additional information and experience of owning and operating stations. We do not believe that this inhibits competition for additional models and deployment by others, but will help support the long-term growth of the electric transportation industry. To fully meet the needs of this growing industry, many more chargers will be needed and supported by a range of companies.

To enhance the proposed pilot, we offer the following additional comments and recommendations:

- 1) In the proposed residential program, the Companies suggest that the pilot will "establish procedures to determine the value and viability of utility managed charging in practice." We recommend that the Companies further define the metrics for valuation and specifically outline the requirements of the residential customers for participation in the program.
- 2) As requested by the Companies, we also strongly support expedited approval of the program. By doing so, it will complement and enhance the state's other programs, including the state's ZEV plans and goals.
- 3) To ensure the maximize benefits of the pilot, we recommend that the Companies file a report to the Commission every six (6) months, rather than annually. By only reporting annually, adequate time would not be available to adjust or modify the program, if needed.


In summary, we believe this pilot to be well-designed, will provide benefits to help reduce customer's overall energy costs, create "downward pressure on utility customer rates" over the long term, and offers an important service in increasing transportation electrification across the state. Please let us know how SEEA can assist the Commission in its consideration of these programs, and we, of course, will participate in any proceeding or workshop that the Commission may wish to establish to gather more information.

If you have any questions or need any support, please feel free to contact me at [ablair@seealliance.org](mailto:ablair@seealliance.org).

Sincerely,



Anne Blair  
Director, Energy Efficient Transportation



Mandy Mahoney  
Executive Director

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