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April 8, 2019

M. Lynn Jarvis  
Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4300

**FILED**

**APR 15 2019**

Clerk's Office  
N.C. Utilities Commission

Re: Docket Nos. E-2, Sub 1197 and E-7, Sub 1195

Dear Ms. Jarvis:

Proterra Inc appreciates the opportunity to provide comments in support of Duke Energy's Proposed Electric Transportation Pilot ("Proposal"). For the reasons below, Proterra urges the North Carolina Utilities Commission ("Commission") to approve.

As background, Proterra is a U.S. manufacturer of one of the world's most fuel-efficient battery-electric buses for public transit. Our buses are 100% designed and built in America and we source over 75% of subcomponents from other American manufacturers. Our primary manufacturing facility is located in Greenville, SC. Proterra buses undergo rigorous Federal Transit Administration testing and meet the FTA's Buy America requirements for rolling stock. Our industry leading CATALYST™ bus can achieve 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions from American cities. We also employ 500+ people across the United States.

In only a few years Proterra has become the zero-emission technology provider of choice in the United States, having sold more than 700 vehicles to over 90 different municipalities, university, airport, federal and commercial customers in 39 states (and 2 Canadian provinces). Transit agencies across the US, including Washington, D.C., Philadelphia, New York City, Lexington, and Park City, among many others, are embracing Proterra as a proven procurement option to meet the needs of today's dynamic transportation market. The same holds true in North Carolina. We have already delivered electric buses to Asheville, NC and Greensboro, NC. In 2019 we are scheduled to deliver buses to Raleigh-Durham International Airport and Go Triangle Durham. And in 2020 we will deliver buses to Duke University.

In just the past few years we have witnessed a transformational shift away from the internal combustion engine to battery-electric technology. The reasons are numerous. Battery prices have dropped by nearly 80 percent over the last decade, the total cost of ownership benefits to consumers and municipalities due to reduced fuel and maintenance costs are overwhelming, vehicle range has significantly increased (with the Proterra Catalyst® driving 1,101 miles on a single charge in September, 2017 on a test track), electric drivetrain performance has reached a point where it exceeds combustion engine technology, and the environmental and public health benefits of zero-emission transit have become a driver of community procurement decisions.

But the benefits of electrifying transportation to ratepayers and to the grid are just as significant. Increased power utilization can create downward price pressure for all consumers. Electrification provides opportunities to strengthen utility service through a smarter grid. Utilities such as Duke Energy can optimize the load profile



on the grid through smart charging and the use of vehicles as distributed storage devices. And electrification efforts can help improve air quality and local community health, particularly in disadvantaged communities. For these and other reasons, utilities throughout the country, including the Public Service Enterprise Group and Southern California Edison, are helping to accelerate transportation electrification through their own filings.

Duke's Proposal is an important step to achieve all of these benefits. It is critical to understanding the effects of increased adoption of electric transportation on the electric grid. It will allow North Carolina to deploy EV infrastructure to meet the needs of the growing EV market. It will increase awareness of the benefits of electric transportation. It will support state climate policies. And it will drive state economic development by creating jobs to support the installation of charging infrastructure.

Proterra supports Duke's efforts to electrify transportation in the state of North Carolina. We therefore respectfully request that the Commission approve Duke's Proposal. If you have any additional questions, please contact me at 864-214-2668 or [emccarthy@proterra.com](mailto:emccarthy@proterra.com).

Sincerely,

Eric J. McCarthy  
SVP, Government Relations, Public Policy and Legal Affairs