



615 North Nash Street, El Segundo, CA 90245

September 4, 2019

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

RE: Docket # E-2 Sub 1197 and E-7 Sub 1195

Dear Ms. Jarvis

Established in 2009, EV Connect is the home of the most innovative and robust cloud-based software platform for managing electric vehicle (EV) charging stations. Our mission is to provide the most flexible, open, and standards-based cloud platform for managing the EV charging ecosystem. Aligned with our mission, we support practical policies and programs that advance the deployment of EVs and create a robust and interoperable EV charging network.

On March 28th, 2019, Duke Energy submitted their North Carolina Electric Transportation Pilot (NC ETP) to the Commission. It focuses on three crucial areas for advancing the deployment of transportation electrification: EV charging management, transit electrification, and public charging expansion.

EV Connect strongly supports Duke Energy's NC ETP as filed and we urge the Commission to expeditiously approve the application and to issue a final order. Currently, there are other transportation electrification incentives being disbursed across the country, like funds from the Volkswagen Mitigation settlement and Federal Transit Authority grants. If the NC ETP was to be expeditiously approved, these funds could be leveraged to strengthen the NC ETP and advance the deployment of transportation electrification in North Carolina.

We believe the NC ETP components will allow for the optimization of grid assets, which will apply downward pressure on rates, and will allow all rate paying customers to benefit. In addition to the consumer benefits, the NC ETP will also help advance the adoption of zero emissions vehicles, which directly supports North Carolina's climate goals.

While we support the NC ETP as filed, we do have one suggestion to strengthen it from a competitiveness perspective. We believe there should be no single provider of software or hardware solutions. Instead, the NC ETP should be open to multiple software and hardware solutions. This will allow Duke Energy to assess what best meets their needs and how to improve programs moving forward.

We appreciate the opportunity to provide comments supporting Duke Energy's NC ETP and we again urge the Commission to approve the program in a timely manner. If you have any questions, please contact me at (202) 394-2804 or bgroters@evconnect.com.

Best,

Brad Groters
Policy and Regulatory Affairs Manager

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Sep 05 2019