

July 8, 2021

Via Electronic Filing

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


RE: In the Matter of: Application for Approval of Proposed Electric
Transportation Pilot
Docket Nos. E-2, Sub 1197 and E-7, Sub 1195

Dear Ms. Campbell:

Enclosed for filing in the referenced docket is the *Petition to Intervene* on behalf of CALSTART's Coalition for Commercial Electric Vehicles.

By copy of this letter, I am serving all parties of record on the service list. Please let me know if you have any questions about this filing.

This the 8th day of July, 2021.


s/
Meredith L. Alexander
Policy Director, CALSTART
67 35th St. 3rd floor Ste C356
BROOKLYN, NY 11232
P: (626)744-5617

NJ/lgf
cc: Parties of Record

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1197

DOCKET NO. E-7, SUB 1195

In the Matter of:)	
Application of Duke Energy Carolinas,)	PETITION TO INTERVENE OF
LLC and Duke Energy Progress, LLC)	CALSTART
for Approval of Proposed Electric)	
Transportation Pilot)	
)	

Pursuant to Commission Rule R1-19, CALSTART (“Petitioners”), file this petition to intervene in the above-captioned dockets, and provide the following information in support of their petition:

1. On March 29, 2019, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies”) applied to the North Carolina Utilities Commission (“Commission”) for approval of a proposed electric transportation pilot (“ET Pilot”).

2. 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 Companies’ 2019 Application in part and directed them to convene a stakeholder session and propose a second phase of pilot programs.

3. The Commission further directed the Companies to develop a “Make-Ready” Program.

4. The Companies filed their Make-Ready Credit programs on April 30, 2021 and Phase II Pilot Programs on May 24, 2021.

5. CALSTART is a member based 501c3 non-profit with regional offices across the country, including in Florida, Michigan, and New York. CALSTART seeks to accelerate the commercialization of clean transportation technologies in the U.S., and with our “Global Drive to Zero” program, across the world. CALSTART has over 280 organizational members including vehicle and component manufacturers, transit agencies, goods movement operators, investor-owned utilities, publicly-owned utilities,

and electric vehicle service providers. CALSTART's Coalition for Commercial Electric Vehicles "CCEV" includes the following commercial vehicle and commercial electric vehicle charging providers: Arrival, Daimler, EVgo, Greenlots, Lion Electric, Morgan Olsen, Nikola, and Volvo Group. Arrival and Volvo Group both have their U.S. headquarters in North Carolina, and Arrival is building a manufacturing facility in North Carolina.

6. The goal of CCEV is to collectively advance utility programs that support fleet electrification and affordable commercial charging solutions. CCEV works to ensure that utility programs support the growth of commercial electric vehicles through thoughtful program and rate design and adoption of best practices for fleet solutions, as we are confident that the role of the utility is paramount for fleet adoption of electric vehicles. CALSTART has offices at 67 35th St. 3rd floor Ste C356 BROOKLYN, NY 11232, amongst other locations.

7. CALSTART and its CCEV members have specialized knowledge regarding medium and heavy-duty electric vehicles as well as fleet and commercial electric vehicle charging infrastructure needs. CALSTART is widely recognized for its expertise on electric trucks and buses, as well as vehicle-grid-integration and rate design for electric vehicle charging. CALSTART has intervened or engaged in utility proceedings on transportation electrification and electric rate design in Michigan, Missouri, Wisconsin, New York, California and other states.

8. CALSTART and its CCEV members whose interests it represents have a direct and substantial interest in this proceeding. CALSTART's CCEV members include vehicle manufacturers and electric vehicle charging providers, and other businesses interested in the future of transportation. CALSTART seeks to intervene in this proceeding to help facilitate customer adoption of electric vehicles (EV's), ensure that customer charging incentives are fair and clear, ensure that Duke

offers fair rates for EV charging, and to offer perspectives from its diverse member base, and comment on the feasibility of proposed technical requirements.


9. The representative for CALSTART to whom all correspondence and filings in this docket should be addressed is:

Meredith L. Alexander
67 35th St. 3rd floor Ste C356
BROOKLYN, NY 11232
malexander@calstart.org
(626) 744-5617

Service by electronic mail pursuant to Commission Rule R1-39 is preferred and should be addressed to malexander@calstart.org

WHEREFORE, CALSTART request that they be allowed to intervene in this docket.

Respectfully submitted this the 8th day of July, 2021.


s/ _____
Meredith L. Alexander, J.D.
malexander@calstart.org
67 35th St. 3rd floor Ste C356
BROOKLYN, NY 11232
P: (626)744-5617
Attorney for CALSTART

VERIFICATION

I, Meredith Alexander, verify that the contents of the foregoing *Petition to Intervene* are true to the best of my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. I am authorized to sign this verification on behalf of CALSTART.

Meredith J. Alexander
718121

Sworn to and subscribed before me this day by Meredith Alexander

This the 8th day of July, 2021.

**SEE ATTACHED FOR
NOTARY FORM**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Sacramento

Subscribed and sworn to (or affirmed) before me on this 08
day of July, 2021, by Meredith L.
Alexander

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



(Seal)

Signature

Jada Lim

CERTIFICATE OF SERVICE

I certify that the persons on the service list have been served with the foregoing *Petition to Intervene* on behalf of CALSTART, either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 8th day of July, 2021



s/

Meredith L. Alexander