

July 29, 2021

Via Electronic Filing

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

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 29th day of July, 2021.

JORDAN PRICE WALL GRAY JONES
& CARLTON, PLLC

/s/

H. Weldon Jones, III
Local Counsel, CALSTART
P.O. Box 10669
Raleigh, NC 27605
P: (919) 828-2501

/s/



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

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)
)

NOW COMES CALSTART (“Petitioner”), by and through undersigned counsel, pursuant to N.C. Gen. Stat. § 1A-1, Rule 24 and N.C.U.C. Rule R1-19 (a), and moves to allow Petitioner to intervene in the above-captioned dockets. In support thereof, Petitioner shows unto the North Carolina Utilities Commission the following:

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

With a copy to local counsel for Petitioner sent to the following address:

Henry W. Jones, Jr.
hjones@jordanprice.com
H. Weldon Jones, III
wjones@jordanprice.com
Jordan Price Wall Gray Jones & Carlton PLLC
1951 Clark Avenue
Raleigh, NC 27605
(919) 828-2501

10. Service by electronic mail pursuant to Commission Rule R1-39 is preferred and should be addressed to malexander@calstart.org with a copy to counsel for Petitioner addressed to wjones@jordanprice.com and hjones@jordanprice.com.

11. Petitioner files this Petition in good faith and not for the purpose of hindrance or delay.

12. For the foregoing reasons, Petitioner respectfully requests the Commission to permit it to intervene in the above-referenced dockets with all rights attendant thereto.

WHEREFORE, CALSTART request that they be allowed to intervene in this docket as follows:

1. That the Petitioner be permitted to intervene with full rights of a party in this action;

2. That the Petitioner be permitted to file briefs and other papers, call and examine witnesses, cross-examine opposing witnesses, and be heard on all matters relative to the issues involved in this action; and

3. For such other and future relief as the Commission deems just and proper.

Respectfully submitted this the 29th day of July, 2021.

Jordan Price Wall Gray Jones & Carlton, PLLC

By: /s/ H. Weldon Jones, III

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Raleigh, NC 27605
Telephone: (919) 828-2501
Local Counsel for Petitioner, CALSTART, for filing purposes.

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 29th day of July, 2021.

Jordan Price Wall Gray Jones & Carlton, PLLC

By: /s/ H. Weldon Jones, III

E2 - Sub 1197
E7 - Sub 1195

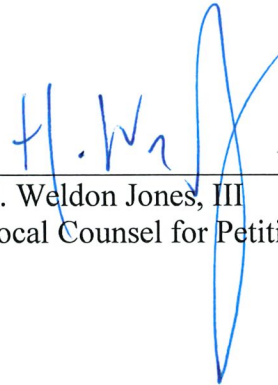
NORTH CAROLINA

VERIFICATION

WAKE COUNTY

H. Weldon Jones, III, being first duly sworn, deposes and says that he is local counsel for CALSTART, the Petitioner, that he has read the foregoing Petition and that the same is true of his own knowledge, except as to those matters and things therein alleged upon information and belief, which he believes to be true.

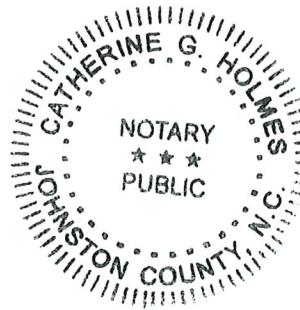
This the 29 day of July, 2021.



H. Weldon Jones, III
Local Counsel for Petitioner, CALSTART

Sworn to and subscribed before me
this the 29th day of July, 2021.

Catherine G. Holmes
Notary Public



My Commission expires: May 28, 2023