

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. M-100, SUB 164**

In the Matter of:)	
Consideration of the Federal Funding)	NCSEA’S INITIAL
Available Under the Infrastructure)	COMMENTS
Investment and Jobs Act)	

NCSEA’S INITIAL COMMENTS

NOW COMES the North Carolina Sustainable Energy Association (“NCSEA”), an intervenor in this docket, and offers the following initial comments in response to the North Carolina Utilities Commission’s (“Commission”) February 1, 2022 Order Allowing Comments Regarding Federal Funding for Utility Service in North Carolina (“Order”).

NCSEA supports the Commission’s preliminary conclusion that it is in the public interest to consider fully utilizing federal grants and loans made available in the Infrastructure Investment and Jobs Act, H.R. 3684, 117th Cong. (2021) (“IIJA”) to ensure “adequate, reliable, and economical utility service” for North Carolina ratepayers.¹ Beyond its work as an advocate in front of the Commission, NCSEA works with partners in applying for grants from both public and private institutions. NCSEA’s support of the Commission’s preliminary conclusion is validated in part by NCSEA’s expertise related to these areas.

The Commission has requested comments regarding appropriate actions for it to take to facilitate receipt and deployment of federal funding made available by the IIJA.² NCSEA believes the Commission should continue to progress programs already underway in potential areas of IIJA funding. To that end, NCSEA suggests the Commission and

¹ Order at 2.

² *Id.*

utilities move forward with seeking additional funding for electric vehicle charging infrastructure pilot docket³, including Duke Energy Carolinas, LLC's, and Duke Energy Progress, LLC's Make Ready Credit Program⁴ and a refined and modified Phase II Pilot⁵ that incorporates the possibility of IIJA funding. NCSEA cautions the Commission and the utilities that the federal funding process involved with the IIJA may take considerable time, and other avenues for electric vehicle charging programs which enable a robust electric vehicle marketplace in the state should simultaneously be sought elsewhere and not limited to the IIJA funding pathway.

Funding under the IIJA, whether loans or grants, should be utilized to achieve the long-term statutory goals in North Carolina including the carbon reduction and eventual carbon neutrality mandate contained in S.L. 2021-165 and to enable markets in North Carolina which will allow for a clean energy transition at the least cost for ratepayers. There is an abundance of options for what can and should be done for the future of electric generation, transmission, and distribution that help to achieve the carbon reduction and carbon neutrality goals in a cost-efficient manner. Because the IIJA-related processes might take years to unfold, NCSEA believes it might be best practice to focus funding requests on longer term efforts. This may include, but is not limited to, federal funding directed towards electrical grid improvements such as additional or improved transmission lines to enable a more diverse set of clean energy generation assets in North Carolina.

³ Docket Nos. E-2, Sub 1197 and E-7, Sub 1195.

⁴ *Order Approving Make Ready Credit Programs with Conditions*, Docket Nos. E-2, Sub 1197 and E-7, Sub 1195 (February 18, 2022).

⁵ See, *Order Requiring Further Collaboration and Report on Proposed Phase II Pilot Programs*, Docket Nos. E-2, Sub 1197 and E-7, Sub 1195, p.3 (February 21, 2022).

NCSEA looks forward to reviewing the initial comments from the other participants in this docket and may elect to file more robust reply comments responsive to other parties' initial comments if necessary. In the meantime, however, NCSEA wishes to express its support of the Commission's preliminary conclusion in its Order and its efforts to facilitate the public utilities of this state pursuing opportunities for federal grants and loans under the IJA.

Respectfully submitted, this the 15th day of March, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing NCSEA's Initial Comments by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 15th day of March, 2022.

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