

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1197
DOCKET NO. E-7, SUB 1195

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF)	
)	
APPLICATION BY DUKE ENERGY)	PETITION TO INTERVENE
CAROLINAS, LLC AND DUKE)	OF
ENERGY PROGRESS, LLC FOR)	EVgo SERVICES LLC
APPROVAL OF PROPOSED)	
TRANSPORTATION PILOT)	

Pursuant to Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission, EVgo Services LLC (“EVgo”), files this petition to intervene in the above-captioned proceedings. In support of its petition, EVgo states:

1. On May 24, 2021, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, the “Duke Entities”) filed their Joint Request for Approval of Phase II Electric Transportation Pilot Programs.
2. EVgo is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 11835 W. Olympic Blvd. Suite 900E Los Angeles, CA 90064.
3. EVgo operates America’s largest public electric vehicle fast charging network, with more than 800 direct current fast charging (“DCFC”) locations located in 34 states and 65 metro markets nationwide. Fast charging is crucial to enabling electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs,

drivers utilizing key transit corridors, as well as fleets, including for car and rideshare applications. Today, more than 130 million people live within a 10 mile drive of an EVgo charger.¹ EVgo has 27 DCFC in 23 North Carolina locations currently in operation, with plans for expansion.²

4. EVgo is directly expanding its fast charging network in Duke Energy's territory and therefore has a direct and substantial interest in the outcome of these proceedings, and its interests will be directly affected by the discussion and resolution of the topics covered therein. EVgo's position and market presence within this State relates directly to the details of the Duke Entities' proposal. EVgo has substantial and specific economic interests in the sustainable and scalable growth of EV charging infrastructure within North Carolina. EVgo currently provides fast charging solutions and services directly to consumers and station site hosts in North Carolina. Therefore, in accordance with the Commission's Rule R1-19, EVgo has a right to intervene in this proceeding.

5. EVgo's interest is not adequately represented by any other party, and EVgo should not be consolidated with any party or group of parties.

6. EVgo is separately filing a Motion for Limited Admission to Practice before the Commission, sponsored by North Carolina attorney Patrick Buffkin.

7. All correspondence related to this proceeding should be addressed to:

Jason B. Keyes
Keyes & Fox LLP
580 California St., 12th Floor
San Francisco, CA 94104
Telephone: (206) 919-4960
jkeyes@keyesfox.com

¹ In July 2020, EVgo announced a partnership with General Motors whereby EVgo will be tripling the size of its public fast charging network.

² Two weeks ago, EVgo opened one of its latest stations in Raleigh, in partnership with North Carolina's Department of Environmental Quality.

Washington State Bar No. 36947

WHEREFORE, EVgo respectfully requests that the Commission allow it to intervene in this proceeding, and become a party thereto for all purposes.

Respectfully submitted, this 12th day of July, 2021.

By: /s/ Jason B. Keyes

Jason B. Keyes
Washington State Bar No. 36947
Keyes & Fox LLP
580 California St., 12th Floor
San Francisco, CA 94104
Telephone: (206) 919-4960
jkeyes@keyesfox.com

VERIFICATION

Jason B. Keyes, first being duly sworn, deposes and says that he is the attorney for EVgo Services, LLC; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of EVgo Services, LLC.

This 9th day of July, 2021.

Jason B. Keyes
Jason B. Keyes

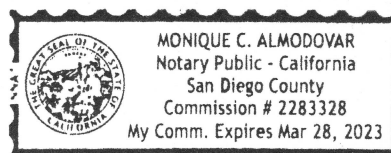
California

San Diego County

Sworn to and subscribed before me this 9th day of July, 2021.

Monique C. Almodovar
Notary Public

Monique C. Almodovar
Print Notary Public Name



My Commission Expires: 3/28/2023

CERTIFICATE OF SERVICE

The undersigned attorney for EVgo Services LLC hereby certifies that he served the foregoing Petition to Intervene upon the parties of record in this proceeding by electronic mail and/or depositing copies in the U.S. Mail, first-class, postage prepaid.

This 12th day of July, 2021.

/s/ Jason B. Keyes _____

Jason B. Keyes
Washington State Bar No. 36947
Keyes & Fox LLP
580 California St., 12th Floor
San Francisco, CA 94104
Telephone: (206) 919-4960
jkeyes@keyesfox.com