

**Brightfield.****OFFICIAL COPY****OFFICIAL COPY****Date:** 4/19/19**To:** M. Lynn Jarvis, Chief Clerk, North Carolina Utilities Commission**From:** Stan Cross, CEO, Brightfield Transportation Solutions

Ged Moody, VP Strategic Partnerships, Brightfield Transportation Solutions

Re: Docket Nos: E-2, Sub 1197 and E-7, Sub 1195**FILED****APR 26 2019**Clerk's Office
N.C. Utilities Commission**Apr 26 2019**

Dear Ms. Jarvis,

On behalf of Asheville, NC-based Brightfield Transportation Solutions, we submit this letter of conditional support and recommendations for Duke Energy's Proposed Electric Transportation Pilot filed as Docket Nos. E-2, Sub 1197 and E-7, Sub 1195.

It is Brightfield Transportation Solution's position that utilities should pilot charging infrastructure technologies and deployment strategies and should support the transition to electric mobility writ large. America is on the verge of significant electric vehicle (EV) market penetration, which has the potential to improve energy security, reduce consumer transportation expenses, place downward pressure on electricity rates, and reduce greenhouse gas emissions. There are, however, critical barriers that need addressing:

- The nation, and particularly the Southeast, lacks the publicly available Level 2 and DC Fast Chargers necessary to meet the growing demand of electric vehicles.
- Municipal fleet owners lack the upfront capital to transition to more expensive transit and school buses and install the required charging stations.
- Utilities need to better assess the grid impacts and opportunities of EV charging and its related activities and technologies; these include EV-related load management, high-speed DC fast chargers, integrated solar generation, integrated energy storage, customer charging preferences, & EV charger hardware management.

Brightfield believes that Duke Energy's Proposed Electric Transportation Pilot should be structured to both stimulate the EV market and provide market and technology understandings:

- Include targeted investments in co-located fast charging, solar generation, battery storage, and energy management systems that deliver stacked benefits such as rapid charging, distributed energy production and storage, grid management, and emergency response to demonstrate lower cost grid-asset solutions with board ratepayer benefits.
- Support and leverage existing programs such as the Western NC Energy Innovation Task Force, Blue Horizons, NC Zero Emission Vehicle Plan, NC VW Settlement, and others.
- Structure the procurement process to enable broad industry participation and diverse technology deployment across the Pilot's various use cases.
- Provide public access to Pilot data and learnings to help EV industry stakeholders move from speculative to data-driven decision making.

Brightfield Transportation Solutions urges the Utility Commission to, with acknowledgment of the implementation recommendations stated above, approve Duke Energy's Proposed Electric Transportation Pilot.

Sincerely,

Stan Cross and Ged Moody