

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 658

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

<p>In the Matter of</p> <p>Consideration of Certain Standards for)</p> <p>Electric Utilities Relating to Measures to)</p> <p>Promote Greater Electrification of the)</p> <p>Transportation Sector Pursuant to the)</p> <p>Infrastructure Investment and Jobs Act)</p>	<p>INITIAL COMMENTS OF</p> <p>CHARGEPOINT, INC.</p>
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Consistent with the November 15, 2022,¹ and April 12, 2023,² orders of the North Carolina Utilities Commission (“Commission”) in the above-captioned proceeding, ChargePoint, Inc. (“ChargePoint”) thanks the Commission for the opportunity to provide these comments regarding the standards established by an amendment to the federal Public Utility Regulatory Policy Act (PURPA) in the Infrastructure Investment and Jobs Act, H.R. 3684 (IIJA).

The IIJA directs each state to consider “measures to promote greater electrification of the transportation sector,” including establishing rates that, among other things, promote affordable and equitable EV charging options for residential, commercial, and public electric vehicle (EV) charging infrastructure and accelerate third-party investment in EV charging.² In these comments, ChargePoint continues to recommend the Commission adopt the PURPA standards throughout the state and also provides several recommendations that will support increased investment in EV charging stations and facilitate deployment of available federal funding in accordance with the IIJA.

In summary, ChargePoint recommends:

¹ Order Scheduling Hearings.

² Order Granting Motion to Amend Order Scheduling Hearings and Cancelling Expert Witness Testimony.

- The Commission should direct each regulated electric utility in the state to submit one or more alternatives to traditional demand-based tariffs for Commission approval within six months from the date of an order in this proceeding.
- The Commission should direct DENC to propose make ready programs within six months from the date of an order in this proceeding.

I. About ChargePoint

ChargePoint is a world-leading EV charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set

access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

II. Infrastructure Investment and Jobs Act of 2021

On November 15, 2021, President Joe Biden signed into law H.R. 3684, the Infrastructure Investment and Jobs Act (“IIJA”).³ The IIJA will allocate \$5 billion to states through the National Electric Vehicle Infrastructure (“NEVI”) Formula Program, which aims to develop a national highway charging system. In addition, \$2.5 billion in competitive grants administered by the federal government will support the deployment of Alternative Fuel Infrastructure, such as electric vehicle charging stations, both along highway corridors and in communities. North Carolina is expected to receive \$109 million over 5 years to support the expansion of EV charging⁴ and will also have the opportunity to apply for the \$2.5 billion in grant funding dedicated to EV charging in the bill.

The IIJA also includes amendments to the Public Utility Regulatory Policies Act (PURPA) which directs utility regulators across the country to consider measures that promote greater electrification of the transportation sector through third-party investments.⁵ Specifically, the PURPA amendments require utility regulators in every state to make a final determination before November 2023 whether to establish new measures, including EV-specific rate designs that:

1. Promote affordable and equitable EV charging options for residential, commercial, and public EV charging infrastructure;

³ H.R. 3684 became Pub. L. No: 117-58 on November 15, 2021, available at: <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>.

⁴ https://www.whitehouse.gov/wp-content/uploads/2021/08/NORTH-CAROLINA_Infrastructure-Investment-and-Jobs-Act-State-Fact-Sheet.pdf.

⁵ See IIJA Section 40431, pp. 620-621.

2. Improve the customer experience associated with EV charging, including by reducing charging times;
3. Accelerate third-party investment in EV charging; and
4. Appropriately recover the marginal costs of delivering electricity to EVs and EV charging infrastructure.

III. Procedural History

On November 15, 2022, the Commission opened this proceeding to commence consideration with respect to the standard established by the PURPA amendments of the IIJA. In its Order, the Commission found that, through previous actions, it had already implemented the standards for Duke Energy Progress, LLC (DEP) and Duke Energy Carolinas, LLC (DEC, collectively Duke). However, the Commission found that it had not implemented standards with respect to promoting electrification of the transportation sector for Virginia Electric and Power Company d/b/a Dominion Energy North Carolina (DENC) and accordingly commenced this proceeding to determine whether it is appropriate to implement the standard for DENC.

ChargePoint has previously submitted comments in Docket No. M-100 Sub 164, opened on February 1, 2022, providing recommendations that the Commission can implement to put the state in the best position to take advantage of formula funds and competitive grants in the IIJA by ensuring that policies and regulations support and enable the competitive market for electric vehicle charging infrastructure.⁶ In those comments, ChargePoint recommended:

- Utilities should be authorized to increase staffing that is dedicated to EV charging infrastructure to accommodate the anticipated influx of new service requests.
- The Commission should expand and enhance existing make ready programs.
- The Commission should simplify and standardize EV infrastructure planning through the adoption of EV line extension policies.
- The Commission should direct the State's utilities to propose alternatives to traditional demand-based rates.

⁶ Initial Comments of ChargePoint, Docket No. M-100 Sub 164, *In the Matter of Consideration of the Federal Funding Available Under the Infrastructure Investment and Jobs Act* (March 3, 2022).

Consistent with our initial comments, and explained in more detail below, ChargePoint continues to recommend that the Commission direct each regulated electric utility in the state to submit one or more alternatives to traditional demand-based tariffs for Commission approval within six months from the date of an order in this proceeding.

IV. Comments

ChargePoint strongly recommends the Commission adopt the PURPA standards in DENC's service territory as this will build upon progress made in the other service territories. It is imperative that commensurate TE efforts are made across the state's service territories to ensure an equitable and effective transition to TE. In fact, DENC's service territory has a large concentration of EJ communities,⁷ requiring significant TE efforts to promote equity in this transition. Thus, appropriate actions by DENC aligned with these standards will maximize the benefits these one-time sources of funding dedicated to increasing access to electric transportation brings to the state, especially for the communities most impacted by emissions.

Additionally, the adoption of the PURPA standards in DENC's territory will generally promote the state's zero-emission vehicle (ZEV) and climate goals to achieve 80,000 registered ZEVs by 2025⁸ and 1,250,000 ZEVs by 2030⁹ to reduce greenhouse (GHG) emissions across the state. As of December 2022, the state had nearly 40,000 active EV registrations.¹⁰ Since it is expected that EV adoption will proliferate within the next few years, the Commission can ensure the competitive market for charging services is also supported in DENC's service territory by

⁷ <https://ncdot.maps.arcgis.com/apps/instant/sidebar/index.html?appid=67947cc90c3f4d02a9dba19ce4203e0c>; See Northhampton, Halifax, Bertie, Washington, Martin, and Hertford counties

⁸ Executive Order No. 80: North Carolina's Commitment to Address Climate Change and Transition to a Clean Energy Economy, 2018, <https://governor.nc.gov/documents/files/executive-order-no-80-north-carolinas-commitment-address-climate-change-and-transition-clean-energy>.

⁹ Executive Order No. 246: North Carolina's Transformation to a Clean, Equitable Economy, 2022, <https://governor.nc.gov/media/2907/open>.

¹⁰ <https://www.ncdot.gov/initiatives-policies/environmental/climate-change/Pages/zev-registration-data.aspx>

adopting the PURPA standards. The following comments provide recommendations on how DENC (and other utilities in North Carolina) can align utility actions with the PURPA standards.

a. Alternatives to Traditional Demand-Based Rates

Currently, in DENC's territory, public EV charging stations will likely take service under Schedule 5P - Small General Service TOU,¹¹ which is available to nonresidential customers with less than 500 kW of demand. This rate contains a Power Supply Demand Charge and a Distribution Demand Charge. Traditional demand-based rates can pose a significant challenge to the deployment of EV charging, particularly at commercial and public charging locations, because these charging sites can be dominated by relatively rare, yet very power-intensive, fast charging sessions. This impact is amplified for fleets and other customers that require charging multiple vehicles simultaneously at high power levels and/or that do not have flexibility to adjust the timing of charging sessions for multiple vehicles.

For public charging sites, conventional commercial rate design often makes otherwise viable and desirable projects uneconomical. In some markets, demand charges can account for as much as 90% of a site host's electricity costs.^{12,13} Unlike traditional commercial customers on demand-based rates, public EV charging station site hosts have very limited ability to manage or mitigate the impact of demand charges without negatively impacting the EV driver experience. For example, a factory or large commercial facility may be able to avoid turning on several large loads at the same time to avoid higher demand charges. By contrast, if a public DCFC site host

¹¹ <https://www.dominionenergy.com/-/media/pdfs/north-carolina---electric/business-rates/schedule-5p.pdf?la=en&rev=e54f2a0ae19640a2a0001f5e78987e1b&hash=674F9E42CAF8671A5A74D4E5742D68A8>

¹² "Site host" refers to the owner or lessor of the property on which an EV charging station is located. Site hosts include residential customers; owners of multifamily housing units (MFH); commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.

¹³ Rocky Mountain Institute, "EVgo Fleet and Tariff Analysis," 2017, available at https://rmi.org/wp-content/uploads/2017/04/eLab_EVgo_Fleet_and_Tariff_Analysis_2017.pdf.

offers four charging ports, the site host could only avoid significant demand charges by limiting the number of ports in use simultaneously or by restricting the amount of power to each port, or both. Either action could negatively impact the driver experience and thus defeat the purpose of expanding public DCFC infrastructure. In fact, for charging stations funded by the NEVI program, stations must have four ports capable of simultaneously charging at 150 kW to minimize time to charge and to ensure a convenient charging experience for all users.¹⁴

Under traditional demand-based rates, site hosts will effectively be penalized for providing charging services not only in the early-stage EV market, but also as charging power levels increase in the future. Additionally, demand charges can permanently penalize site hosts that provide charging services in locations that will continuously have low, sporadic, or seasonal utilization, such as in rural areas and disadvantaged communities like DENC's service territory. Simply put, high demand charges coupled with low utilization can be an impediment to the widespread deployment of EV charging stations. The current demand-based commercial rate structures may not only slow down the deployment of NEVI stations, but also inhibit growth of third-party investments in DCFC. Therefore, ChargePoint recommends the Commission direct each regulated electric utility in the state to submit one or more alternative alternatives to traditional demand-based tariffs for Commission approval within six months from the date of an order in this proceeding.

ChargePoint recognizes that Duke Energy's Flex Savings Option for Businesses does not charge customers for the first 30 kW of billing demand.¹⁵ While this represents a step in the right

¹⁴ Under the NEVI program guidance, maximum charge power per DC port should not be below 150 kW: https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf.

¹⁵ More information about Duke Energy's Flex Savings Option for Businesses is available at: <https://www.duke-energy.com/Info/unindexed/Rates/Flex-Savings-Option-Business?jur=NC01>.

direction in the development of alternative rate designs, most DCFC charging sites will far exceed 30 kW of demand and therefore would receive negligible relief from high demand charges. It is imperative that additional rates are developed to provide long-term demand-charge alternative rate options for EV charging stations in North Carolina. Further, the large difference in demand charges between the utility service territories greatly influences the economic feasibility for DCFC deployment. Without intervention by the Commission to ensure EV-supportive rates are available across all utility service territories, NEVI-funded stations will likely be concentrated in areas where the rate structure happens to be favorable, rather than sites that best serve the needs of long-distance travelers in EVs, as the IIJA intends. These inconsistent rate offerings for DCFC may then lead to long-term geographic disparities in EV charger deployment and access, especially in the rural communities serviced by DENC and thus subsequently hinder EV adoption and its benefits in this part of the state.

Intentional and consistent rate design throughout the state can alleviate the demand charge burden while assuring recovery of prudently incurred utility costs, assuring fairness to all customer classes, and setting economically efficient prices that optimally allocate utility and customer resources. Because EV chargers will contribute new load to the system, it is possible to design alternative rates without cost-shifting between customer classes or increasing costs to ratepayers. While rates are generally designed to cover the embedded cost of service, it may be appropriate for the Commission to consider EV rates that recover marginal costs to serve new EV load. In fact, a recent report by the National Association of Regulatory Utility Commissioners examining best practices for PURPA 111(d) implementation noted, “As long as rates are set to recover at least marginal costs, existing customers will bear no additional costs from bringing this new load onto

the system, while benefitting in the long-term from downward pressure on rates due to the addition of incremental commercial EV load onto the grid.”¹⁶

Overall, implementing appropriate rate designs that eliminate, defer, or reduce demand charges is key to unlocking increased investment in the EV charging infrastructure needed to support EV drivers throughout North Carolina, as well as those travelling through the state. Therefore, ChargePoint urges the Commission to consider multiple, long-term sustainable rate designs that more precisely allocate costs and benefits of EV load. Although Duke may have a demand charge alternative rate available, the Commission should continue to encourage the utilities to offer multiple, favorable rates aligned with the PURPA standard.

Due to the various use cases (e.g., corridor fast charging, fleet, workplace, residential, etc.), there is no “one-size-fits-all” EV charging rate; therefore, the Commission should ensure the utilities have flexibility in developing appropriate solutions for their customers and can look to numerous examples of alternatives to traditional demand-based rate structures that are currently in effect. It is important to note that some of the alternative rate structures are “technology neutral” enabling any commercial and industrial customer to take service on the applicable rate structure whether the customer operates an EV charging station or not. DENC’s sister utility in Virginia has a low load factor rate (below 200 kWh per kW) that ChargePoint regards as a best practice.¹⁷ This rate provides an all-volumetric, technology-neutral, low-load factor rate applicable to non-residential customers with a load factor below 200 kWh per kW. This rate effectively provides relief from prohibitive demand charges for low-load factor customers through an all-volumetric

¹⁶ “Best Practices for Sustainable Commercial EV Rates and PURPA 111(d) Implementation,” December 2022, available at <https://pubs.naruc.org/pub/55C47758-1866-DAAC-99FB-FFA9E6574C2B>

¹⁷ See Schedule GS-2, available at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/business-rates/schedule-gs2.pdf?la=en&rev=65c74050107549f299d48689f738e948&hash=7CBE70107AE10C66B8EB5C5A1E248D12>

rate that has been designed to recover the utility's cost to serve. DENC's sister utility in South Carolina also has a relatively favorable rate available for EV charging site hosts for DENC's consideration.¹⁸

ChargePoint highlights a few other existing alternative rate structures below – which we also regard as current best practice.

- a. **Evergy, Kansas: Business EV Charging Service:** Evergy's Business EV Charging Service provides a three-period time-of-use (TOU) rate option for non-residential customers for the exclusive use of charging electric vehicles.¹⁹ While this rate eliminates the demand charge and has been designed to recover the majority of costs through volumetric energy charges, it does include a small kW-based facility charge (\$2.32/kW).
- b. **Madison Gas and Electric, WI: Low Load Factor Rate (50% Demand Reduction):** The Low-load factor rate provides a 50% discount in the demand charge for customers with load factors below 15%. This technology-neutral rate is targeted not only for DCFC facilities, but also other types of low-load-factor customers.²⁰
- c. **Eversource, Connecticut: Electric Vehicle Rate Rider:** Eversource's EV Rate Rider converts the per-kW demand-based charges included in the Company's general service rate schedule into an equivalent per-kWh volumetric rate. This rider is available for all public EV charging stations, non-public DCFC, and non-public installations of four or more networked Level 2 chargers that are enrolled in a managed charging program.²¹

Eversource's EV Rate Rider essentially converts its traditional general service rate into an all-volumetric rate for customers providing EV charging services under the specific conditions outlined in the tariff. ChargePoint believes that this solution should be considered as it could provide a simple, effective solution for prohibitive demand charges. However, ChargePoint believes that the solution would need to be modified to be inclusive of all commercial EV charging use cases.

¹⁸ See Rate 16, available at <https://www.dominionenergy.com/-/media/pdfs/south-carolina/rates-and-tariffs/rate16.pdf?la=en&rev=7912aa92c298448b8211455ff04e3701&hash=60ECC969517C6D35B3889CB0EEB9E8CD>

¹⁹ https://www.evergy.com/-/media/documents/billing/kansas-central/other/bevcs-business-ev-charging-service-12062021_03282022.pdf.

²⁰ See <https://www.mge.com/MGE/media/Library/pdfs-documents/rates-electric/E32.pdf>. See also <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=402247>.

²¹ https://www.eversource.com/content/docs/default-source/rates-tariffs/ct-electric/ev-rate-rider.pdf?sfvrsn=e44ca62_4.

- d. **Arizona Public Service (APS): Rate Rider DCFC Pilot:** APS' Rate Rider DCFC provides an upper limit on the monthly billed demand for customers who are taking service on one of APS' E-32 TOU rates and where electricity is consumed only by public, DCFC stations.²² The Rate Rider DCFC includes a load factor limit which the customer must be under to be eligible for participation, and includes three periods in which the load factor limit decreases, ultimately sunseting in 2031.²³ The monthly billed demand is limited through the following formula:

$$(\text{Monthly Billed kWh}) / [\text{load factor limit} * \text{Days} * 24 \text{ hours}]$$

While this rider does represent a step in the right direction to provide relief from demand charges, it is not ChargePoint's preferred solution for alternative rate designs for commercial EV charging customers. First, the pilot is only available to public DCFC stations. This fails to acknowledge that demand charges are also an impediment for the deployment of EV charging stations for other high demand, low-load factor use cases (e.g., fleet charging, clustered public Level 2 charging, clustered Multi-family Level 2 charging). Additionally, this solution does not provide a long-term, cost-based solution to a problem that will continue to persist. For example, low-load factor EV charging stations will continue to exist after the Rate Rider DCFC sunsets, even as EV adoption increases, to serve certain charging segments. While ChargePoint does believe there is some merit in considering a similar solution, it would need to be modified to ensure that all use cases are considered and provide a long-term solution.

- e. **Eversource, National Grid, and Unitil; Massachusetts:** For commercial EV customers with relatively low peak demand (less than 100-200 kW), Eversource's GS-1, National Grid's GS-2, and Unitil's GD-2 eliminate demand charges and bill EV customers entirely on a volumetric (per kWh) basis. For customers with higher monthly peaks, Eversource's EV-2, National Grid's GS-3 and Unitil's GD-3 rates provide a discount on demand charges on a sliding scale according to utilization.²⁴ The sliding-scale rates appropriately consider market growth (i.e., utilization) by adjusting per-kW and per-kWh charges in each graduation of the sliding scale to make the effective price of electricity relatively consistent for EV customers. Rates will be effective in July 2023 and be available for ten years to provide stability and predictability to the EV charging market. The sliding scale graduations are based on the following structure:

- <5% utilization: 100% demand charge discount

²² See APS' Direct Current Fast Charging Pilot Schedule at <https://www.aps.com/en/Utility/Regulatory-and-Legal/Rates-Schedules-and-Adjustors#Business>, located under the Rate riders tab.

²³ Period One is December 1, 2021, through June 30, 2025, with a load factor limit of 25%, Period Two is July 1, 2025, through June 30, 2028, with a load factor limit of 20%, and Period Three is July 1, 2028, through June 30, 2031, with a load factor limit of 15%.

²⁴ Massachusetts Department of Public Utilities, D.P.U. 21-90; D.P.U. 21-91; D.P.U. 21-92 Final Order, issued on December 30, 2022, available at: <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/16827694>

- Between 5% and 10% utilization: 75% demand charge discount
- Between 10% and 15% utilization: 50% discount
- >15% utilization: regular demand charges

- f. **Central Hudson, National Grid, NYSEG, RG&E, ConEdison, Orange & Rockland; New York:** The New York Public Service Commission has approved short-term and long-term relief for demand charges across the state. In the short term, all investor-owned utilities must provide a 50% discount on existing demand charges for all public DCFC customers. The demand charge discount will offer immediate relief while the utilities design and propose long-term rate solutions. Like the Massachusetts solution, the “EV Phase In” rates eliminate demand charges at low (<5%) load factors and phase in demand charges on a sliding scale as load factor increases, with relief available up to 20% load factor.²⁵ Each utility service territory will have discretion to design the appropriate mix of per-kW and per-kWh charges in each graduation of the sliding scale to recover the revenue requirement based on the embedded cost of service. The framework for the EV Phase In Rates was approved in January 2023, and rates should be available for enrollment by mid-2024. When the EV Phase In Rates are available, all commercial EV customers will also be able to opt in to managed charging programs to further managed operational costs and minimize the grid impacts of coincident peak load.

b. Make Ready Programs

As discussed in our previous comments,²⁶ make ready programs are designed to support increased deployment of EV charging stations by offsetting the costs of make ready infrastructure incurred by site hosts who wish to install, own and operate L2 and/or DCFC stations on their property. Utility investments in make-ready infrastructure can spur private investment in EV charging stations by reducing, or eliminating, the cost of the associated make-ready infrastructure necessary to deploy a charging station. In comparison with utility-owned and operated EV charging networks, make-ready programs also avoid placing the burden of ongoing O&M, including costs associated with operating an EV charging network, and the cost to procure charging

²⁵ New York Public Service Commission, Order Establishing Framework for Alternatives to Traditional Demand Based Rate Structures, Docket No. 22-E-0236, issued on January 18, 2023 and available at: <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={2043A628-EC7D-4064-9F32-662D82598760}>

²⁶ Initial Comments of ChargePoint, Docket No. M-100 sub 164, pp. 5-6.

stations, on utility ratepayers. This effectively lowers the cost to the utility and its ratepayers to deploy an EV charging station which can result in greater deployment of EV charging infrastructure without the need to increase the program's budget; and as an additional benefit could lead to significantly more energy being sold through a higher number of deployed EV charging stations resulting in downward pressure on utility rates to the benefit of all utility ratepayers, rather than just those that are EV drivers. Additionally, these programs can streamline the installation process of EV charging equipment for site hosts and support the existing competitive market for EV charging station hardware and network services. Investments in make-ready also benefit the utility because they can be treated as rate base assets on which the utility earns its authorized rate of return. Finally, make-ready incentives can support a greater number of charger deployments with the same budget because site hosts share in the cost of the charging stations.

Further, make-ready programs provide a reasonable pathway for utilities to ensure a long-term, sustainable market for EV charging services necessary to support increasing EV adoption. Investing in make-ready infrastructure is an excellent example of a utility playing a role that only it, as the monopoly utility, can play because it reduces one of the largest cost barriers to charging station deployment for site hosts – namely, the wiring, conduit, paneling, and civil construction work needed to provide power to charging stations. This also aligns with the utility's key competency of installing and maintaining distribution assets, allowing utilities to support third-party investment in EV charging rather than hindering the development of the competitive market.

Accordingly, ChargePoint recommends the Commission direct DENC to develop and implement make ready programs. The Commission has already approved residential and commercial make-ready credit programs for Duke Energy in North Carolina. DENC's sister utility also has experience implementing make ready incentives, as exemplified by Dominion Energy's

Smart Charging Infrastructure Pilot Program in Virginia.²⁷ Therefore, the Commission should ensure implementation of a make ready program in DENC and also consider expanding the current available programs in the state.

V. Conclusion

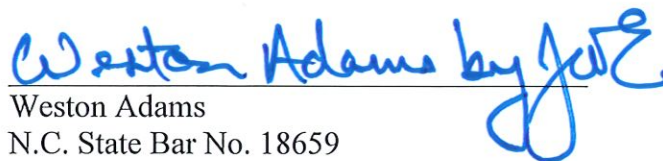
ChargePoint appreciates the Commission's consideration of these comments regarding how North Carolina can implement PURPA standards to accelerate deployment of EV charging infrastructure and to support a long-term sustainable and competitive market for the installation and operation of electric vehicle charging infrastructure consistently across the state. ChargePoint looks forward to participating and contributing to future discussions with other interested parties and stakeholders on how to effectively use competitive forces to efficiently utilize federal funding to achieve widespread beneficial transportation electrification.

Respectfully submitted this 5th day of May, 2023.

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²⁷ Final Order. Petition of Virginia Electric and Power Company for approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia, and for approval of an addition to the terms and conditions applicable to electric service. Case No. PUR-2019-00154. (March 26, 2020).


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Initial Comments of ChargePoint, Inc.
filed in Docket No. E-22, Sub 658 was served electronically upon all parties of record.

This the 5th day of May, 2023.



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May 05 2023