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July 1, 2019

Ms. Martha Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

Clerk's Office
N.C. Utilities Commission

RE: Duke Energy's Electric Transportation Pilot – Dockets E-2, Sub. 1197 and E-7, Sub.1195

GoDurham is the public transit agency for the City of Durham with a fleet of 60 buses operating 24 bus routes located in Duke Energy's service territory. Our transit partners include GoTriangle, GoRaleigh, GoCary, and Chapel Hill Transit. We are writing to urge the North Carolina Public Utilities Commission to approve Duke Energy's proposed Electric Transportation Pilot ("proposal"). We also offer an important clarifying suggestion around the Electric Vehicle Transit Bus Charging Station Program that will ensure transit agency ability to participate in the program.

In 2020, GoDurham will receive its first two electric transit buses because we won a Federal Transit Agency grant to cover the incremental cost of electric buses over diesel buses. However, we have learned through conversations with Duke Energy the costs of necessary electric infrastructure upgrades at our depot may be prohibitively high as we look toward electrifying a larger portion of our fleet. These additional costs for infrastructure leading to the charging station may be a barrier to our goal to swap out our diesel buses for electric buses.

We strongly support the plan stated in Duke Energy's proposal to provide transit agencies with bus charging equipment free of charge. However, the language in Exhibit F, "Electric Vehicle Transit Bus Charging Station Program" needs to be clarified. Currently, Exhibit reads that Duke Energy "shall fund \$75,000 per [Electric Vehicle Transit Bus] procured within the preceding 24 months for purchase and installation of qualifying [...] charging equipment at Customer site." If a transit agency will need infrastructure upgrades beyond the charging station itself, these indirect charging equipment costs should be covered by Duke Energy as well. Duke Energy's proposal should clarify and make explicit that transit agencies will not be responsible for such additional costs for charging stations.

GoDurham supports the use of electricity customer funds for infrastructure upgrades and installation such as transformer replacement and laying of conduit to transit bus fueling depots for the following reasons:

- GoDurham can only do its part in fulfilling the City of Durham's public policy to achieve carbon neutrality in city operations by 2040^{1,2} if we are financially able to transition our diesel bus fleet to 100% electric.
- Reducing tailpipe emissions along bus routes through transit electrification will help alleviate pollution burdens for low-income Durham households. All Durham census blocks experiencing the top 5% of tailpipe emissions density are in the lowest quintile (0th to 20th percentile) for average household income -- less than \$41,000 per year.³
- Enabling a faster transition from diesel to electric transit buses across North Carolina will help cities maintain US EPA attainment with regard to ozone and other transportation-related air pollutants, even as their population grows.
- All Duke Energy electric customers will pay toward the proposed \$76 million transportation electrification plan, and equitable distribution of ratepayer funds requires offering benefits to those who do not own electric vehicles, such as transit users.

Thank you for considering GoDurham's remarks on alleviating transit agency charging infrastructure cost burdens in the proposal. If Duke Energy makes explicit in its proposal that it will cover these costs, we believe this will in turn maximize participation in the Electric Vehicle Transit Bus Charging Station Program and help ensure the pilot's success.

Sincerely,



Pierre Osei-Owusu,
Transit Administrator,
GoDurham and City of Durham

¹ Durham City Council, "Resolution of the Durham City Council Supporting a Transition to Renewable Energy and Carbon Neutrality," April 1, 2019, <https://durhamnc.gov/DocumentCenter/View/26400/City-of-Durham-Renewable-Energy-and-Carbon-Neutrality-resolution-Approval-Date-4-1-2019>

² "Greenhouse Gas Emissions," The City of Durham, accessed July 1, 2019, <https://durhamnc.gov/263/Greenhouse-Gas-Emissions>

³ Jackson Floum, Yingyu Fu, Alexander Yoshizumi, Liyue Zhang, "Assessing the Outcomes of a Long-term, Zero-emission Strategy for GoTriangle's Transit Fleet" (Masters project, Duke University, 2019), p.68, <https://dukespace.lib.duke.edu/dspace/handle/10161/18345>.