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March 5, 2024

VIA ELECTRONIC FILING

Ms. A. Shonta Dunston
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Fourth Joint Status Report of Duke Energy Carolinas, LLC and
Duke Energy Progress, LLC on Phase II Pilot Programs - PUBLIC
Docket Nos. E-7, Sub 1195 and E-2, Sub 1197**

Dear Ms. Dunston:

Please find enclosed for filing the Fourth Joint Status Report of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (the "Companies") on their Phase II Pilot Programs. Certain information included in the report constitutes trade secrets and is being filed under seal pursuant to N.C. Gen. Stat. § 132-1.2. Parties to the docket may contact counsel for the Companies regarding obtaining copies pursuant to an appropriate confidentiality agreement.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Higginbotham', written in a cursive style.

Jason A. Higginbotham

Enclosure

cc: Parties of Record

OFFICIAL COPY

Mar 05 2024

proposed Electric Vehicle School Bus, Direct Current Fast Charging, and Multi-Family Dwelling Charging pilots (collectively, “Phase I Pilots”); (2) declined to approve four other pilot programs; and (3) directed Duke Energy and the parties to the dockets to engage in stakeholder collaborative discussions about the structure and implementation of the approved programs. The ET Pilot Order also required Duke Energy to file within six months of the order the Companies’ proposed Phase II ET Pilot Programs.

Make Ready Credit Programs

In the ET Pilot Order, the Commission required that one of the attributes any ET pilot program proposed by the Companies must include “consideration of or as an aspect of the pilot,” a “Make-Ready Approach” under which:

Duke should leverage familiarity with permitting requirements, the interconnection process, and the design, operations, and maintenance of the distribution system to efficiently identify and develop appropriate preparations for EV infrastructure.¹

Accordingly, on April 30, 2021, the Companies filed a request for approval of tariffs establishing their proposed Make Ready Credit (“MRC”) programs in the above-captioned dockets. The Companies’ stated in their application that their proposed MRC programs would defray the cost of make ready infrastructure installed by customers via a structure akin to the revenue credit approach in the Companies’ Line Extension Policies based on estimates of the aggregate increase in electric revenue for the first three to five years following installation of Electric Vehicle Supply Equipment (“EVSE”). On February 18, 2022, the Commission issued an *Order Approving Make Ready Credit Programs with Conditions* in the above-captioned dockets approving the proposed MRC programs and directing certain reporting by the Companies including semi-annual reports starting 12 months after the order.

¹ ET Pilot Order at 21.

Phase II ET Pilot Programs

In compliance with the Commission’s directive in the ET Pilot Order to file proposed Phase II ET Pilot programs, on May 24, 2021, the Companies filed an application requesting approval of four Phase II Pilots. The Companies stated in their application that the “Phase II Pilot Programs [had been] designed, after approximately six months of engagement with, and input from, the Electric Transportation Stakeholder Group (“ETSG”) to comport with the Commission’s ET Order and to provide valuable feedback on how best to help North Carolina reach Executive Order No. 80’s (“EO 80”) goal of 80,000 zero emission vehicles on North Carolina roads by 2025.”²

On February 21, 2022, the Commission issued an *Order Requiring Further Collaboration and Report on Proposed Phase II Pilots* (“Phase II Pilot Order”). The Phase II Pilot Order directed the Companies to continue working with the ETSG, and to refine and modify their Phase II Pilots to take into consideration the possibility of receiving direct funding under the Infrastructure Investment and Jobs Act (“IIJA”), H.R. 3684, 117th Cong. (2021), enacted on November 15, 2021, and/or other recently available sources of federal funds. In addition, the Commission directed the Companies to file a report within 90 days updating the Commission on its progress on these directives.

Since issuing the Phase II Pilot Order, the Companies have submitted their First, Second, and Third Phase II Pilot Reports on October 3, 2022, January 6, 2023, and September 5, 2023, respectively. In each of the reports, the Companies provided updates on their efforts to leverage federal funding opportunities in their implementation of the proposed pilots and generally reported on their inability to comply with the Commission’s directives because program structures were still under development. However, the Companies described their continued engagement with the

² Executive Order No. 80, North Carolina’s Commitment to Address Climate Change and Transition to a Clean Energy Economy, Oct. 29, 2018.

ETSG and the North Carolina Department of Transportation (“NC DOT”) as well as their internal processes for tracking development of IJJA programs.

In its Phase II Pilots Third Status Report Order, the Commission reiterated that the Companies should explore potential modifications to their Phase II pilots to fully leverage such funding. As a result, the Commission directed the Companies to answer the following questions in their next report:

1. Has Duke received or applied to directly receive any federal funding that would fund, in whole or in part, the Phase I or Phase II Pilots? If so, provide the details of such funding, including:
 - a. date of the application;
 - b. source of the funding;
 - c. amount applied for;
 - d. intended use of the funds;
 - e. any response to the application;
 - f. and if no response yet, expected date of response.

2. Has Duke assisted another entity to make an application for federal funding that would further the objectives, in whole or in part, of the Phase I or Phase II Pilots? If so, provide the details of such assistance, including:
 - a. entity assisted;
 - b. date of the application;
 - c. source of the funding;
 - d. amount applied for;
 - e. intended use of the funds;
 - f. any response to the application;
 - g. and if no response yet, expected date of response.³

As described below, the Companies have continued to evaluate approaches to modifying their Phase II Pilots to leverage available federal funding and complement existing and anticipated federal and state activities. Given the applicable IJJA program eligibility requirements and in an effort to more efficiently facilitate the achievement of North Carolina’s clean energy and EV-related goals, the Companies have concluded that it is in the public interest to withdraw their Phase

³ Phase II Pilots Third Status Report Order at 5.

II Pilot applications. The Companies plan to submit a formal request to the Commission to withdraw their Phase II Pilot application for the reasons discussed below.

EVSE Pilots and Programs

On May 11, 2022, the Companies filed a Joint Motion to Withdraw Customer Operated Electric Vehicle Supply Equipment Pilots from Phase II Pilot Proposals and to Hold Phase II Pilot Dockets in Abeyance. On July 13, 2022, the Commission issued its *Order Allowing Withdrawal of Proposed Customer Operated Electric Vehicle Supply Equipment Pilot Programs and Extending the Time for Developing Remaining Phase II Pilot Proposals*, in the above-referenced dockets, approving the Companies' request to withdraw their EVSE pilots, ordering the Companies to file proposed EVSE tariffs within 30 days and ordering the Companies to continue their efforts to comply with the directives of the Phase II Pilot Order.

As directed by the Commission, on August 15, 2022, the Companies filed a Petition for Approval of their EVSE programs as full-scale commercial programs in the above-captioned dockets. On August 8, 2023, the Commission issued its *Order Approving Customer Operated Electric Vehicle Supply Equipment Tariffs with Conditions*, in the above-captioned dockets, approving the proposed EVSE tariffs and (1) directing certain requirements for the recovery of any EVSE costs; (2) establishing that the Commission will review the EVSE tariffs three years after their effective date to determine whether the tariffs should be continued, amended, or discontinued; and (3) directing the Companies to submit a semi-annual report on the EVSE tariffs with the first report, which should be consolidated with the MRC semi-annual report, to be filed on March 1, 2024.

Vehicle to Grid Pilot Program

On August 16, 2022, DEC filed an application for approval of a vehicle to grid (“V2G”) demand response pilot in Docket No. E-7, Sub 1275. This pilot was designed to provide system benefits beyond those of a simple managed charging offering, and the application was approved on April 11, 2023; however, due to several factors, including delays in the availability V2G capable EVs, required technology, and economic conditions, on November 22, 2023, DEC filed a motion requesting to postpone implementation of the V2G pilot until January 1, 2025. On December, 11 2023, the Commission issued an order approving DEC’s motion to suspend the launch and implementation of the pilot until January 1, 2025.

EV Managed Charging Pilots

On February 11, 2022, the Companies submitted a joint application for approval of their proposed EV Managed Charging Pilot Programs in Docket Nos. E-2, Sub 1291 and E-7, Sub 1266. The Companies’ filed the Managed Charging Pilots to increase their understanding of managed charging and to test novel technology, customer acceptance, complex cost of service-based price signals and the integration of managed charging into system resources. As part of the Managed Charging Pilots, the Companies partnered with automotive original equipment manufacturers, (“OEMs”) to test the Open Vehicle Grid Integration Platform (“OVGIP”). The OVGIP, owned and operated by the OEMs, establishes a two-way utility interface that applies utility industry communication standards and provides interoperability with the OEMs’ vehicle telematics application. Enrollment for the Managed Charging Pilots began on September 1, 2023, and the program launched in November 2023. Between DEC and DEP, the Pilots are 95% subscribed. The Pilots will run through October 2024 and the Companies will complete the required Evaluation, Measurement & Verification (“EM&V”) of the pilots by the April 30, 2025 due date.

Off-Peak Charging Programs

On December 18, 2023, the Companies filed a joint application for approval of their respective Off-Peak Charging (“OPC”) pilot programs in Docket Nos. E-7 Sub 1301 and E-2 Sub 1334, which the Companies proposed in compliance with the Commission’s orders approving the respective rate increases for DEP in Docket No. E-2, Sub 1300 and DEC in Docket Nos. E-7, Sub 1134 and E-7, Sub 1276. The OPC programs will enable the Companies to better estimate the revenues associated with EV sales in their service territories that should be excluded from their respective Commission-approved residential revenue per customer decoupling mechanisms. The pilots intend to introduce a simple programmatic structure to promote passive managed charging to North Carolina EV drivers.

UPDATE ON ELECTRIC VEHICLE PHASE II PILOTS

For the Commission’s convenience, the Phase II Pilots include the following:

- **Public L2 Phase II Pilot.** This Pilot is intended is to develop and maintain publicly accessible L2 EV charging stations to support EV adoption and serve Duke’s customers. For the L2 Phase II Pilot, the Companies had proposed 160 ports.
- **Multi-Family Level 2 Phase II Pilot.** Multi-family locations will include apartments, condominiums, and retirement homes. For this component of the Phase II Pilot, the Companies had proposed 160 ports.
- **Highway Corridor Fast Charging.** The Companies also intend to install 80 fast chargers for highway corridor fast charging across their service territories.
- **EV School Bus Program.** In Phase II, the Companies propose a deployment of approximately 4-6 buses at 10-15 sites for a total of 60 buses.

The Companies have continued to provide quarterly updates to the ETSG and have worked to reevaluate the potential to leverage federal funding for the Phase II Pilots in light of the evolving state of EV charging in North Carolina. The Companies held their most recent ETSG meeting on March 1, 2024.

The Companies have been regular working group participants in the development and support of the 2023 Clean Transportation Plan (“CTP”). During their engagement with the NC DOT, the Companies shared lessons learned and observations from programs and activities across the Duke Energy footprint on topics such as education and frequently asked questions about EVs, the importance of simplifying EV adoption, rate structures and EV charging load management, and considerations and structures that will enable medium- and heavy-duty as well as large fleet electrification.

The Companies continue to support and track progress of the relevant IIJA programs, most notably activity related to National Electric Vehicle Infrastructure (“NEVI”) funding. To that end, at the request of the NC DOT, the Companies gave a presentation on best practices and engagement for prospective market recipients of IIJA funding on October 18, 2022. Using their experiences and lessons learned from the Phase I Pilots, the Companies have been able to provide input on challenges such as supply chain, securing contracts with site hosts and on how the details of EV charger components can impact the need for driver education. The Companies have also engaged with NC DOT on critical items such as designing efficient processes for NEVI site capacity inquiries. With the recent release of maps for prospective NEVI sites, the Companies are now actively reviewing locations for adequate electrical capacity and assisting with identification of sites for which the cost of line extension is low. NC DOT continues to work toward the release of solicitations for the first phase of NEVI sites. However, as of the date of this update, the first such solicitation has not been issued by NC DOT. Stakeholder engagements for deployment of any excess NEVI funds to install EV charging for underserved communities also remain pending at this time.

A. Furthering the Goals of Phase I and Phase II Pilots with Federal Funding

While the Companies have pursued IIJA funding for areas of investment not relevant to the Phase I and Phase II Pilots, they are not eligible funding recipients for the majority of funding programs that would further the objectives of the EV Pilots. The state's NEVI program is an exception. However, the Companies view their role in the NEVI program as one of supporting the state and market actors that will vie for North Carolina's NEVI funds. The Companies expect the market response to pending NC DOT requests for proposal to be robust. Therefore, to facilitate the efficient distribution of NEVI funds by avoiding competition with potential applicants that may also effectively promote the state's EV-related objectives, the Companies have elected not to pursue NEVI funds or site deployments. Instead, the Companies will utilize their existing MRC program and proposed OPC program to incentive EV adoption by offering credits to participants that comply with program requirements. In addition, the Companies will continue to support other their pursuit of federal funding for programs and initiatives that align with the objectives of the Companies EV Phase I and Phase II pilots. **Appendix A (CONFIDENTIAL)** to this Report lists the Letters of Support the Companies have submitted for entities that have applied for federal funding for EV programs similar to the Companies' Phase I and Phase II Pilots.

While NC DOT has initiated NEVI activity, there are still multiple phases of deployment and the Companies do not know how any remaining discretionary funds will be used. Given the factors listed above, the Companies have concluded that it is not practical to attempt to structure their Phase II Pilot programs in a way that will meaningfully complement current state and federal activity or leverage potential sources of federal funding. As a result, the Companies believe it is in the public interest to withdraw their application for the Phase II Pilot programs. The Companies have notified the ETSG and the Public Staff of their intention to withdraw the Phase II Pilot

programs and will follow this Report with a formal request to the Commission after the Companies have had an opportunity to answer questions and provide further information to the Public Staff.

UPDATE ON PHASE I PILOTS

The Companies provide the following progress report on Phase I as well as operating data on the public charging infrastructure portion of the Pilots.

A. Status of Public Charging Installations (as of Jan 31, 2024)⁴

	Approved by NCUC	Commissioned	Engineering & Construction	Additional Contracted	Site Hosts Needed
Public DCFC	40 Dispensers ⁵	36 Dispensers	4 Dispensers	0 Dispensers	None
Public L2	160 Ports ⁶	154 Ports	6 Ports	0 Ports	None
Multi-Family Dwelling L2	80 Ports ⁷	76 Ports	4 Ports	0 Ports	None

B. Obtaining Public Charging Site Host (& Related) Agreements

In prior updates on the progress of Phase I public charging deployments, the Companies reported several challenges associated with executing site host agreements. These challenges included host concern with easements and liability waivers as well as lengthy approval timelines for municipalities. As of this report, the Companies are pleased to share that they have assigned a site host to all chargers approved by the Commission for this pilot with appropriate program agreements executed.

C. Concerns with Supply Chain

Currently, the national shortage of transformers remains the only notable supply chain constraint. While the Companies have assigned all DCFC sites a transformer from the Companies' inventory, allocation of transformers is performed according to a hierarchy and is dynamic. As a

⁴ Table shows DEC and DEP combined.

⁵ Referred to in the tariffs as DCFC "stations."

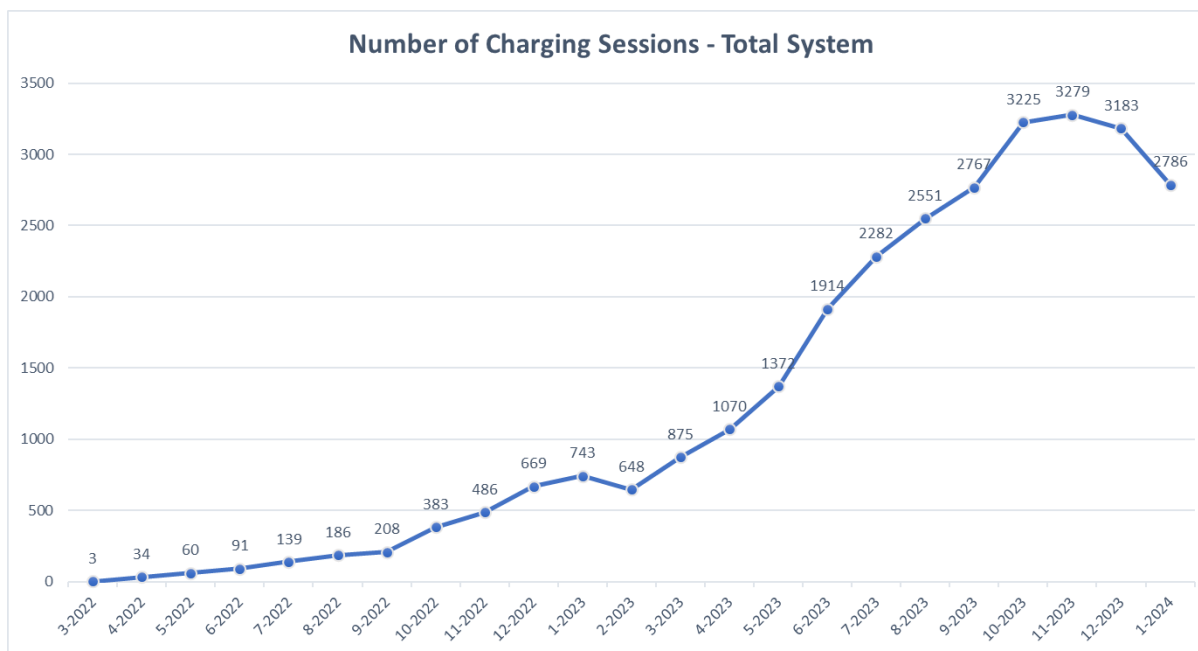
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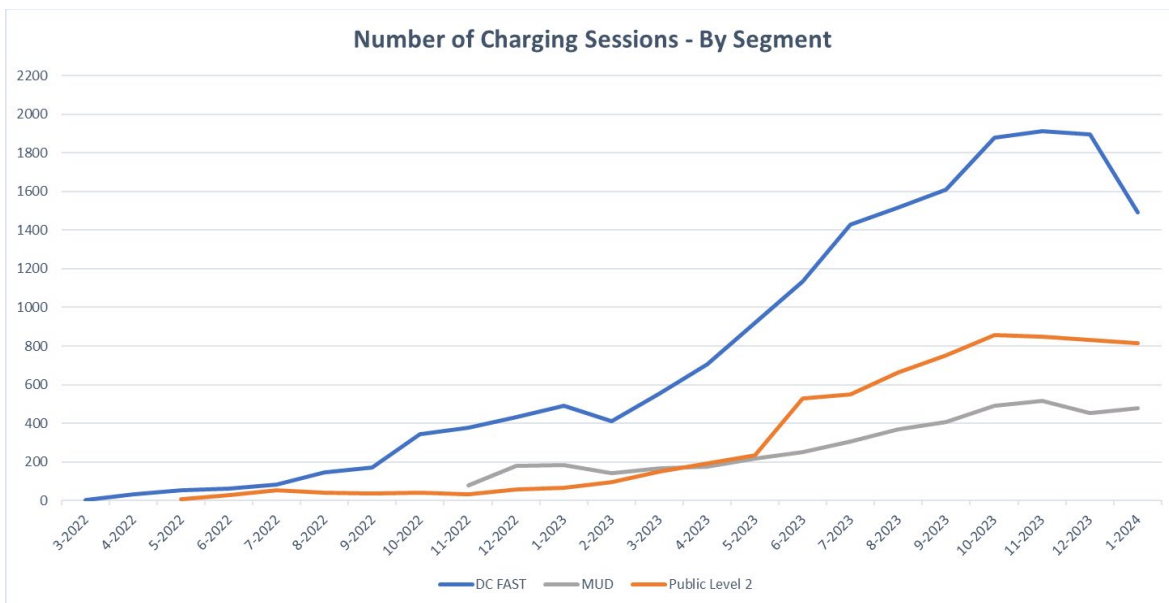
result, changing conditions – such as severe storms that damage service to the Companies’ customers – could result in further delays.

D. Statistics from Installed Charger Base

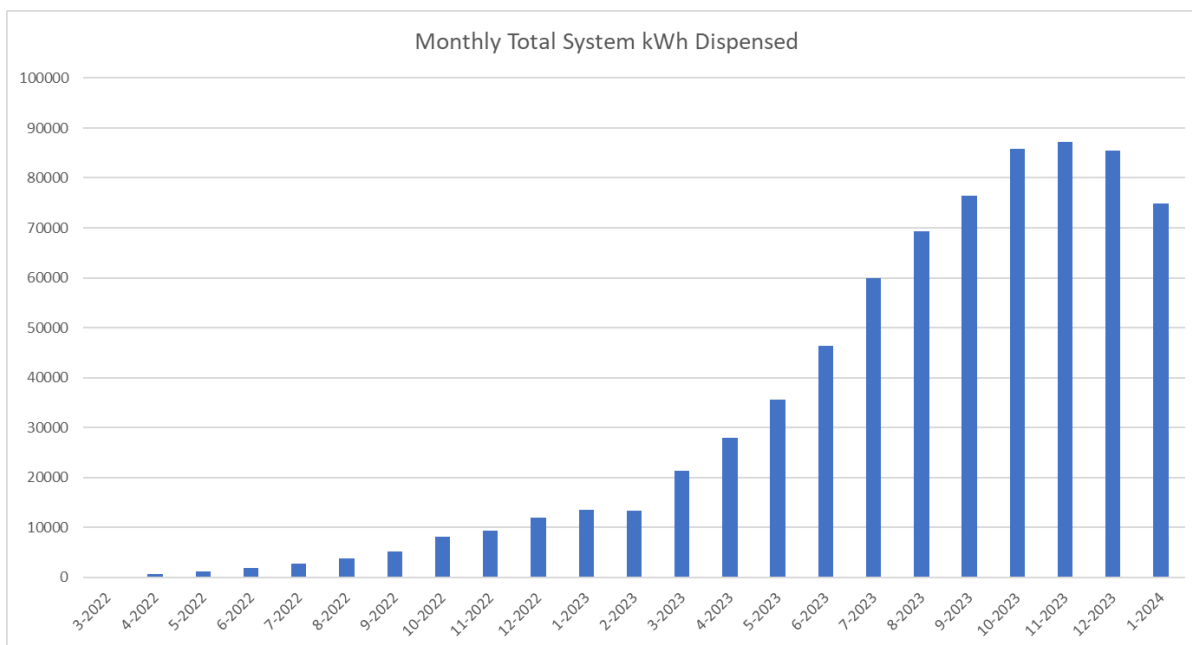
The Companies have provided updated trends and statistics for usage of Phase 1 chargers deployed below. The first figure below tracks the total number of charging sessions on the system per month beginning in March of 2022, when the first Phase 1 charger was commissioned and continuing through January of 2024. As can be observed, Session volume is generally increasing, with November 2023 showing forty percent more charging sessions across the Phase 1 chargers as compared to July 2023.



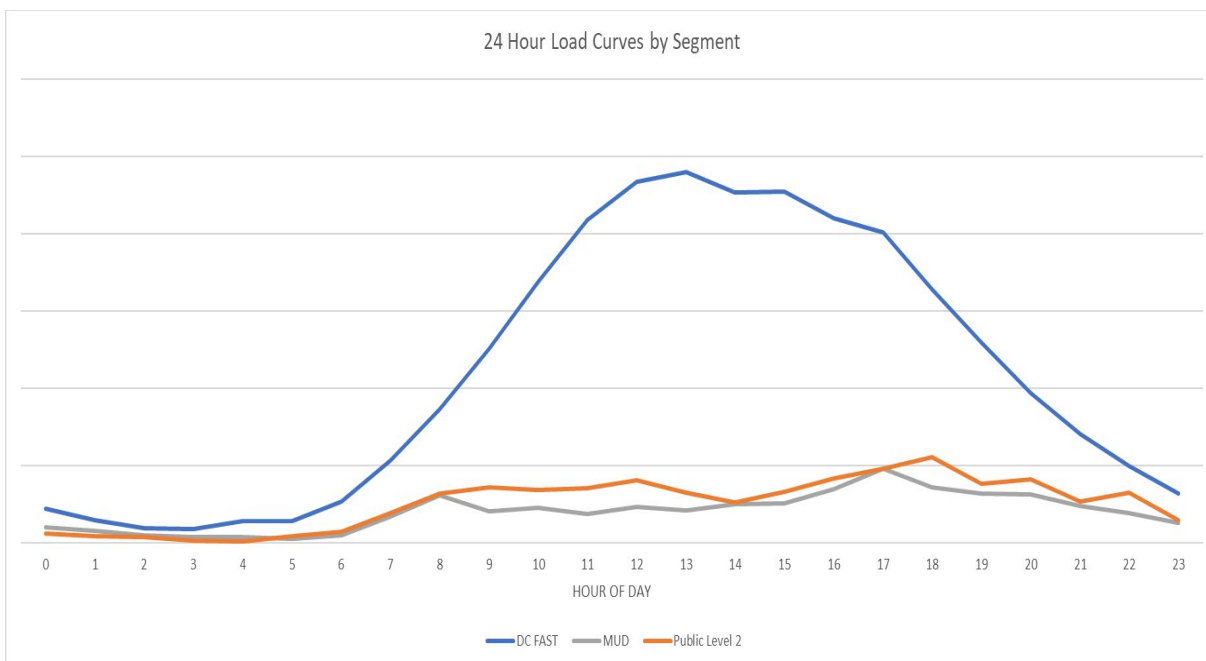
The next figure shows the same data but broken down into the three public charging use cases. This chart highlights, as has historically been the case, that DCFC usage dominates the number of charging sessions. Also notable within the DCFC data is a sharp downturn in charging sessions in January of 2024. The Companies are investigating possible causes of this apparent twenty percent drop. Initial analysis has not revealed a clear root cause.



The following graph shows the monthly increase in kWh dispensed by the North Carolina Park & Plug system that corresponds with additional charging session count. In total, drivers in North Carolina have charged their EVs to the tune of nearly 741 MWh – a 170% increase since the Companies last report. Assuming one kWh powers 3.5 miles driven, the Phase 1 network has enabled over 2.59 million miles driven.



Finally, daily load curves have further taken shape. As shown in the chart below and as is consistent with prior reports, DCFC usage is notable during normal hours in which drivers would travel long distance. While obscured by the magnitude of the DC fast charging load, the public Level 2 segment curve shows a concentration of usage through the workday morning hours and into early afternoon before falling off until a maximum peak around typical dinner time hours. Multi-family dwelling usage is concentrated in the evening hours, presumably when tenants return home for the day, but also shows a small spike at 8:00 am. As a result, the multi-family dwelling segment may be ripe for simple EV load management measures that will assist the Companies in managing growth on the electric system while also potentially saving money for EV drivers.



E. Next Steps for Public Charging Programs

The extended pilot period draws to a close on November 24, 2024. The Companies are initiating plans to transition the network to interested buyers and to bring the public charging portion of the ET Pilots to a close.

F. Phase I School Bus Program.

The Companies support of interested districts in their pursuit of North Carolina Department of Environmental Quality (“NC DEQ”) Volkswagen mitigation (“VW”) trust funds resulted in eight school districts receiving funding for 17 buses. As of February 23, 2024, the program has secured customer agreements and the full complement of necessary funding (including program funds, customer funds, and funds from other sources) for 27 buses at 9 school districts and 3 charter schools. One district that received NC DEQ VW funds for five buses has elected to proceed with three buses instead of five. In response to that decision, the Companies are working with North Carolina Department of Public Instruction (“NC DPI”) to reassign the associated NC DEQ funding to one or more interested districts.

i. Remarks on V2G Technology

V2G technology remains in the early stages of development. As of this report, the Companies are aware of only one vendor that offers a UL-certified, V2G-capable DC Fast Charger. Other vendors are expected to enter the market, but the timeframe is unknown. Additionally, while two sites are now energized, the chargers continue to experience technical issues preventing reliable charging performance as well as bidirectional power flow. The Companies are actively working with manufacturers and program participants to troubleshoot the charging systems and ensure that affected school districts can operate. Despite these issues, the Companies remain committed to exploring the potential benefits to the system of bidirectional charging technology in school buses.

ii. Status of School Bus Program Deployment

Approved by NCUC	Commissioned	Engineering, Procurement & Construction	Additional Contracting & Funding Needed
30 Buses	8 Buses	17 Buses	5 Buses

iii. Projected In-Service Timeframes

Q1 2024	Q2 2024	Q3 2024
0 Buses	8 Buses	9 Buses

The 2024 timeline for deploying the remaining program sites is primarily driven by the delivery dates of the buses, which have lengthy manufacturing lead times following the Companies', participant districts' and NC DPI's efforts to secure funding from NC DEQ. To allow for more time to complete desired learnings, the Commission granted the Companies' Joint Request for Extension of NC Electric Transportation Pilot Phase I Electric School Bus Program by order issued on January 27, 2023, which extended the duration of the EVSB Pilot Program to June 30, 2025.

UPDATE ON THE COMPANIES' MANAGED CHARGING STRATEGY

As requested by the Commission's Phase II Pilots Third Status Report Order, the Companies hereby provide the following update on their managed charging strategy. For consumer-owned, light duty vehicles, there are multiple effective approaches to achieve the goal of managed charging, which is to reduce the impact of EV charging on utility system peak loads. As the Companies seek to attract and meet the needs of early EV adopters, less complex and controlled options are sufficient, but more sophistication and control are likely needed as adoption ramps up.

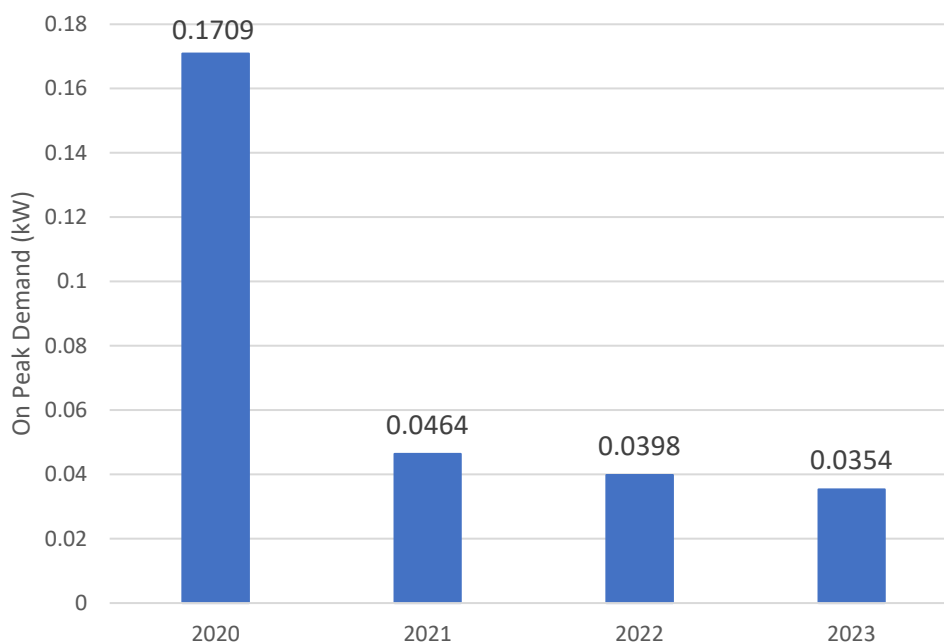
Off-Peak Charging Credit Program

The Companies' proposed OPC programs provide a straightforward approach to managed charging through which program participants avoid charging their EVs during certain time periods. The relative simplicity of these programs has proven effective in recruiting participants and shifting load as the EV market has continued to grow. Duke Energy has demonstrated this

effectiveness in South Carolina and at a larger scale in Florida. The Companies are also in the process of implementing a similar program in Indiana. The Off-Peak credit structure is proving successful in other jurisdictions, and on December 18, 2023, the Companies submitted an application for approval of North Carolina versions of the programs in Docket Nos. E-7 Sub 1301 and E-2 Sub 1334, as noted above.

The chart below provides quantitative results on load shifted comparing pre-program habits to post-enrollment habits of the South Carolina pilot program drivers as of the spring of 2023. From program inception, a near 80% reduction in per participant on-peak charging demand was achieved.

SC Average On-Peak Charging Demand by Off-Peak Credit Participants Over Time



Time of Use Rates

In North Carolina, Time of Use (“TOU”) rates preceded EV managed charging. TOU rates which apply to a customer’s entire usage, not just their EV charging load, have slightly more sophisticated pricing signals than off-peak programs, but also manage around system peaks. Importantly, the malleable nature of EV charging means that customers who would benefit from TOU adoption even without an EV can further utilize the rate structure for the significant consumption of their EV.

The Companies are preparing analytics to demonstrate the impact of new TOU-CPP rates on residential EV charging. As the Companies implement new rates and customer adoption of TOU rates increases, the shape of EV charging load for customers on TOU that also have EVs can be estimated using metering data and subsequently compared to the unmanaged case. In addition to allowing for the effective management of demand for homeowners, TOU rates also have potential to drive winter peak savings at workplace charging sites. Duke Energy’s experience in operating workplace chargers outside the Carolinas, such as Florida, informs this perspective.

Active Managed Charging

Active charging management represents the most sophisticated means of managed charging. Through such an approach, the Companies would actively control charging based on system conditions while balancing grid and consumer needs (for adequately charged batteries). In practice, this approach might operate to shape load routinely, on a daily basis, and would not only curtail EV charging but would also turn charging “on” to achieve that balance. Customer engagement is key for a successful active managed charging program. In addition, customers must feel confident that the utility will competently manage charging of the customer’s EV so that the EV is sufficiently charged for use when needed. Pilots like the Companies’ EV Managed Charging

program and others across the country are providing critical information for successful programs at scale in this regard.

Enhancements to the Different Approaches to Managing Charging

Innovation in EV load management continues to yield numerous potential solutions. The Companies continue to explore different approaches to complement their existing and proposed programs and tariffs, which consist of their TOU rates, active managed charging programs, and proposed OPC programs. For example, the Companies are testing the following two additional potential approaches to managed charging.

- **Subscription Rates** – The Companies’ North Carolina-managed charging pilot is an early-stage example of active managed charging. Specifically, the program will pause charging for participants in times of grid constraint — a precursor to timing charging for multiple participants during a window of excess capacity. The pilot also tests customer appetite for an adoption-simplifying flat rate for a large allotment of monthly kWh, a feature that provides certainty of charging costs for an often poorly understood technology.
- **Vehicle-to-Grid Functionality** – The North Carolina V2G demand response pilot is also an example of an approach to active managed charging that goes beyond simply managing energy used for charging in that the Companies elect when to deploy the bidirectional charging capability of participants’ EVs. In this case, the ability to both pause charging and store energy in an EV battery that can be exported to the grid enhances the functionality of the program. While the Companies’ have suspended the launch and implementation of their V2G Pilot for various reasons previously described to the Commission, the Companies are optimistic that they will have an opportunity to leverage insights from deployment of the program in the future.

CONCLUSION

The Companies submit the foregoing report in compliance with the Phase II Pilots Third Status Report Order, including the Commission's directive to evaluate the possibility of receiving direct funding under the IIJA or other recently available sources of federal funds. The Companies have performed this evaluation and have determined, for the reasons stated above, that it is in the public interest to withdraw their applications for their proposed Phase II Pilots. The Companies have notified the ETSG and the Public Staff of their intention to withdraw the Phase II Pilot programs and will follow this Report with a formal request to the Commission after the Companies have had an opportunity to answer questions and provide further information to the Public Staff.

Respectfully submitted, this 5th day of March 2024.



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**DUKE ENERGY CAROLINAS, LLC
DUKE ENERGY PROGRESS, LLC**

CONFIDENTIAL APPENDIX A

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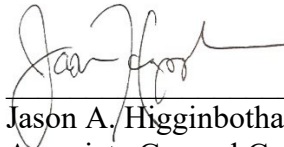
DOCKET NO. E-7, SUB 1195

DOCKET NO. E-2, SUB 1197

CERTIFICATE OF SERVICE

I certify that a copy of the Fourth Joint Status Report of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC on Phase II Pilot Programs, in Docket Nos. E-7, Sub 1195 and E-2, Sub 1197, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 5th day of March, 2024.



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