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October 11, 2023

**VIA ELECTRONIC FILING**

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

**RE: Joint Request by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Extension of North Carolina Electric Transportation Phase I Public Charging Pilot Programs  
Docket Nos. E-2, Sub 1197 and E-7, Sub 1195**

Dear Ms. Dunston:

Enclosed for filing in the above-captioned dockets is the Joint Request by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Extension of North Carolina Electric Transportation Phase I Public Charging Pilot Programs.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Jason Higginbotham". The signature is written in a cursive, flowing style.

Jason A. Higginbotham

Enclosure

cc: Parties of Record

OFFICIAL COPY

Oct 11 2023

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

	)	<b>JOINT REQUEST BY DUKE ENERGY</b>
In the Matter of Application	)	<b>CAROLINAS, LLC AND DUKE</b>
by Duke Energy Carolinas, LLC	)	<b>ENERGY PROGRESS, LLC FOR</b>
and Duke Energy Progress, LLC for	)	<b>EXTENSION OF NORTH CAROLINA</b>
Approval of Proposed Electric	)	<b>ELECTRIC TRANSPORTATION</b>
Transportation Pilot	)	<b>PHASE I PUBLIC CHARGING PILOT</b>
		<b>PROGRAMS</b>

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NOW COME Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) and together with DEC, the “Companies” or “Duke Energy”), by and through counsel, and hereby request that the North Carolina Utilities Commission (“Commission”) extend the term of the Companies’ North Carolina Electric Transportation (“ET”) Phase I Public Charging Pilot Programs, consisting of Duke Energy’s (1) Multi-Family Dwelling Charging Station Pilot Program; (2) Public Level 2 (“L2”) Charging Station Pilot Program; and (3) Public Fast Charging Station Pilot Program (collectively, the “Park & Plug Program”), which the Commission approved in its November 24, 2020 *Order Approving Electric Transportation Pilot, In Part*, in Docket Nos. E-2, Sub 1197 and E-7, Sub 1195 (“ET Phase I Pilot Order”). The Companies request that the end date for the three above-referenced ET pilots that comprise the Park & Plug Program be extended for an additional 12 months from November 24, 2023 until November 24, 2024 to enable the Companies to complete an evaluation, measurement, and verification (“EM&V”) analysis of the pilots, as required by the ET Order, and to determine next steps for the program, including an appropriate exit strategy once the programs have concluded. The Companies further

request that the Commission issue an order granting their request prior to November 24, 2023 so that the pilots may continue without interruption.

In further support of their requests, the Companies state the following:

1. In the ET Phase I Pilot Order, the Commission approved Duke Energy's proposed Public L2 Charging Station Program and limited versions of the Companies' proposed Multi-Family Dwelling Charging Station and Public Fast Charging Station Programs for a term of 36 months following their initial effective dates, which was November 24, 2020. As a result, the three pilot programs are currently set to expire on November 24, 2023.

2. The Companies have worked diligently to deploy the electric vehicle ("EV") charging stations authorized by the ET Order in a timely manner. However, challenges in executing site host agreements as well as supply chain constraints have impacted Duke Energy's ability to achieve full deployment of chargers on the Companies' original projected timeline and have delayed program implementation. The impending expiration of the pilots on November 24, 2023 will preclude the Companies from gathering necessary data to evaluate the effectiveness of the pilots.

3. As noted, the Companies have experienced challenges executing site host agreements. Several anticipated charging site agreements were declined based on concerns by prospective hosts about granting easements and liability waivers associated with hosting the equipment. In addition, municipal hosts often require a lengthy internal review process, which impacts the speed with which the Companies can execute agreements. While the Companies have now assigned all the chargers approved by the ET Order to site hosts and

have executed site host agreements, these challenges impacted the timeline for completing this essential step in the program implementation process.

4. In addition, the Companies have experienced supply chain issues with various pieces of equipment, such as panelboards and conduit, which have impacted the timeline for implementation of the pilots, and the national shortage of transformers remains a significant supply chain constraint. The Companies currently project sufficient allocation of transformers to the Park & Plug Program to complete the installation of all authorized chargers by November 24, 2023; however, changing conditions – such as a severe storms or other events that damage existing equipment – could result in further delays.

5. In its January 27, 2023 *Order Approving Extension of Time for Completion of Electric Vehicle School Bus Pilot Program*, issued in this docket, the Commission found good cause to extend the duration of the Companies’ Electric Vehicle School Bus (“EVSB”) Pilot Program because external factors had impacted the implementation of that pilot and would shorten the timeline for Duke Energy to perform a vehicle to grid study. The Commission should similarly consider the impact of the external factors described herein on the Companies’ ability to perform an EM&V analysis of the Park & Plug Program and extend the duration of the three public charging pilots as requested.

6. The Companies’ have provided updates to the Commission on their efforts to implement their ET pilot programs, including the Park & Plug Program, through their Joint Status Reports on the Companies’ Phase II Pilot Programs, which are required by the Commission’s December 2, 2022 *Order Requiring Further Collaboration and Report on Proposed Phase II Pilot Programs* in this docket (“ET Phase II Pilot Order”). The Companies’ filed their most recent joint status report on September 5, 2023, summarizing

the above-noted implementation issues, and commit that they will provide an update on their Park & Plug Program in any future updates required by the ET Phase II Pilot Order if the Commission approves the requested extension.

7. On September 22, 2023, the Companies hosted their 2023 Third Quarter Update Meeting with the Electric Transportation Stakeholder Group (“ETSG”). During the September meeting, the Companies informed the ETSG that the Companies’ planned to request an extension from the Commission for the Park & Plug Program. No member of the ETSG expressed opposition to Duke Energy’s plan to request the extension. In addition, the Companies have conferred with the Public Staff on this request and have been authorized to represent that the Public Staff does not oppose Duke Energy’s request.

WHEREFORE, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission issue an order prior to November 24, 2023 granting the Companies’ request and extend the expiration date for the (1) Multi-Family Dwelling Charging Station Pilot Program; (2); Public L2 Charging Station Pilot Program; and (3) Public Fast Charging Station Pilot Program authorized by the ET Order from November 24, 2023 until November 24, 2024 and grant any other such relief that this Commission deems appropriate.

Respectfully submitted this 11<sup>th</sup> day of October, 2023.



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*Counsel for Duke Energy Carolinas, LLC  
and Duke Energy Progress, LLC*

CERTIFICATE OF SERVICE

I certify that a copy of the Joint Request by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Extension of North Carolina Electric Transportation Phase I Public Charging Pilot Programs, in Docket Nos. E-2, Sub 1197 and E-7, Sub 1195, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1<sup>st</sup> Class Postage Prepaid, properly addressed to parties of record.

This the 11<sup>th</sup> day of October, 2023.



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