

OFFICIAL COPY

Apr 17 2019

In the Matter of
Application by Duke Energy Carolinas, LLC)
and Duke Energy Progress, LLC for Approval)
of Proposed Electric Transportation Pilot)

MOTION TO EXTEND TIME
TO FILE COMMENTS
AND REPLY COMMENTS

1. On March 29, 2019, DEC and DEP (collectively, Duke) filed an application in this docket seeking approval of Duke's proposed electric transportation pilot. According to the application, the estimated cost of the three-year pilot is approximately \$76 million, which Duke intends to recover through DEC's and DEP's base rates.

2. The pilot consists of seven programs for each company for a total of 14 programs: residential rebate, commercial and industrial fleet, electric vehicle (EV) school bus, EV transit bus, multi-family level 2 charging, public level 2 charging, and DC fast charge network.

3. On April 4, 2019, the Commission entered an Order establishing deadlines to intervene and to file comments and reply comments. Pursuant to the Order, intervenors and the Public Staff may file initial comments on or before May 6, 2019, and all parties may file reply comments on or before May 20, 2019.

4. The Public Staff has reviewed the application and believes additional time is needed to conduct discovery and discuss the various aspects of the 14 programs with Duke and the intervenors. The Public Staff is investigating a number of subjects, including: the analysis of the underlying scale of each program; the costs and benefits of each program and details of the study attached as Exhibit B to the application; whether the programs will help or promote a competitive market for EV charging (or not); the technologies Duke intends to deploy; details regarding the tariffs; and, whether the experience of other states and the assistance of private parties with EV experience in this State can inform Duke and the Commission as to the potential electric system and customer benefits of increased EV use without the need to undertake the size of the programs proposed by Duke. To that end, the Public Staff has already submitted one data request to Duke consisting of 50 questions, not including subparts. More data requests and follow-up data requests are anticipated.

5. The Public Staff recognizes that Duke has requested expedited review of the application. However, the stated need for expedited review only applies to the EV school bus program and Duke's desire to advocate for the Department of Environmental Quality to commit to funding the replacement of school buses with EV buses from the Volkswagen Settlement Environmental

Mitigation Trust. The EV school bus program is the second most expensive program in Duke's pilot and premature approval without appropriate investigation into this and the rest of the programs would not be in the public interest.

6. Based on the foregoing, the Public Staff believes an additional 60 days from the May 6, 2019, deadline is necessary to accomplish a thorough review and provide comments to the Commission. Therefore, the Public Staff would request an extension to file initial comments up to Friday, July 5, 2019, and to file reply comments to Friday, July 19, 2019.

7. The Public Staff has discussed this proposed extension with counsel for Duke, the North Carolina Sustainable Energy Association, and the Sierra Club. No party opposes the granting of this extension.

WHEREFORE, the Public Staff respectfully requests the Commission grant an extension to file initial comments to Friday, July 5, 2019, and to file reply comments to Friday, July 19, 2019

This the 17th day of April, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
s/ Layla Cummings
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
layla.cummings@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that a copy of this Motion has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 17th day of April, 2019.

Electronically submitted
s/ Layla Cummings