

**Fulmore, Janice**

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**From:** smtprelay  
**Sent:** Friday, July 5, 2019 5:12 PM  
**To:** Statements  
**Subject:** Statement of Position Submitted by Stan Cross

## Statement of Position Submitted

### Name

Stan Cross

### Email

scross@brightfieldts.com

### Docket

Docket Nos: E-2, Sub 1197 and E-7, Sub 1195

### Message

Date: 7/5/19 To: M. Lynn Jarvis, Chief Clerk, North Carolina Utilities Commission From: Stan Cross, CEO, Brightfield Transportation Solutions Re: Additional Comment, Docket Nos: E-2, Sub 1197 and E-7, Sub 1195 Dear Ms. Jarvis, On behalf of Asheville, NC-based Brightfield Transportation Solutions, I submit the following additional comment related to Duke Energy's Proposed Electric Transportation Pilot filed as Docket Nos. E-2, Sub 1197, and E-7, Sub 1195. Having read through comments in the docket, I submit this charging infrastructure-related comment in addition to Brightfield Transportation Solutions letter of support filed on 4/26/19: The Number of Public Chargers Needed to Support 80,000 Battery Electric Vehicles—The US Department of Energy's EVI Pro Lite Tool has been used to make conflicting arguments about how many public charging stations will be needed to support Executive Order 80's goals. Establishing this market need is essential because it sets the context for the public charger element of Duke Energy's filing. When determining the need, consider three factors: i. Executive Order 80 calls for 80,000 battery electric vehicles and does not include plug-in hybrid electric vehicles. Some arguments have included plug-in hybrids in their calculations, which skews the results. ii. In 2025 the market will be comprised of a percentage of lower range 100+ mile and longer range 250+mile battery electric vehicles. For middle-lower income households, the 100+ mile range vehicles, especially purchased used, will be the most economically viable electric transportation access point. Some arguments have assumed all EVs in 2025 are 250+mile range, which skews the results. iii. With the growing number of multi-family unit dwellings constructed throughout the state combined with a lack of garage access/on-street parking for residents living in many urban neighborhoods, including both disadvantaged communities and wealthier historic districts, there will likely be a growing number of EV owners who do not have access to home charging. The assumptions made about these inputs significantly changes the market need for public chargers related to Executive Order 80's goals. For example, if you assume that in 2025 25% of battery electric vehicles in NC will get 100+mile range and 75% will get 250+mile range and that 10% of EV drivers will not have access to home charging, the market need, especially for DC Fast Chargers, is significant. With those assumptions inputted, EVI Pro Lite calculates that NC will need 676 Workplace chargers, 507 Public Level 2 Chargers, and 862 Public Fast Chargers. There is no way to determine future electric

transportation market conditions, especially given the nascent state of the market and lack of adequate historical data. So assumptions need to be made. There needs to be agreement on these market assumptions, and that agreement needs to take into account equity and home charging access concerns specific to NC trends, and need to align with the terms of Executive Order 80. Sincerely, Stan Cross

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