

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-2, SUB 1197  
DOCKET NO. E-7, SUB 1195**

<b>In the Matter of:</b>	)	
	)	
<b>Application by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Proposed Electric Transportation Pilot</b>	)	<b>NCSEA’S REPLY COMMENTS ON MAKE READY CREDIT PROGRAMS</b>
	)	

**NCSEA’S REPLY COMMENTS ON MAKE READY CREDIT PROGRAMS**

Pursuant to the North Carolina Utilities Commission’s (“Commission”) *Order Requesting Comments* issued on May 28, 2021, the North Carolina Sustainable Energy Association (“NCSEA”), an intervenor in the above-captioned proceeding, offers the following reply comments on *Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s Request for Approval of Make Ready Credit Programs* (“Application”) filed by Duke Energy Progress, LLC (“DEP”) and Duke Energy Carolinas, LLC (“DEC”) (DEP and DEC collectively “Duke”) on March 29, 2019, which proposed the creation of a Make Ready Credit program.

As noted in *NCSEA’s Initial Comments on Make Ready Credit Programs* (“NCSEA Initial Comments”) NCSEA is generally supportive of the Make Ready Credit program proposed by Duke but restates here its suggestions to improve the program as set out in NCSEA Initial Comments. Additionally, upon reviewing the initial comments of the other intervenors, NCSEA supports the following suggestions to improve the Make Ready Credit Program Proposal.

**I. NCSEA SUPPORTS THE FOLLOWING SUGGESTED CHANGES**

NCSEA commends the intervenors in this docket for providing meaningful and thoughtful comments on both the Make Ready Credit Program and the proposed second phase of the Duke ET Pilot program. However, upon close review, the following suggestions stood out as needing amplification and support in the implementation of the Make Ready Credit Program.

**A. NORTH CAROLINA JUSTICE CENTER AND SOUTHERN ALLIANCE FOR CLEAN ENERGY**

The North Carolina Justice Center (“NCJC”) and Southern Alliance for Clean Energy (“SACE”) presented their *Comments of Southern Alliance for Clean Energy and North Carolina Justice Center* (“NCJC/SACE Initial Comments”) and included in them several suggestions for amendments for the Make Ready Credit Program that NCSEA supports.

**i. EM&V**

First, NCSEA supports the suggestion to require Duke to add Evaluation, Measurement, and Verification (“EM&V”) in their Make Ready Credit Programs. Consistent with the position taken by NCSEA in its initial comments on the Pilot Phase II proposals,<sup>1</sup> NCSEA believes that a robust EM&V process is instrumental to evaluating a program such as the proposed Make Ready Credit Programs. NCSEA supports the suggestions made by SACE and NCJC in the NCJC/SACE Initial Comments to implement a robust EM&V process in the Make Ready Program.<sup>2</sup> NCSEA would specifically support this request made by SACE/NCJC:

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<sup>1</sup> NCSEA’s *Initial Comments on Pilot Phase II Proposals*, pp. 2-3 (July 29, 2021).

<sup>2</sup> NCJC/SACE Comments, pp. 5-6.

NC Justice Center and SACE recommend that Duke Energy devise a plan, with stakeholder input, for using the Make Ready Credit Programs to collect and report data. This could initially be accomplished as part of the EM&V for the ET Pilot Programs, as it is critical to incorporate data from the Make Ready Credit Programs to understand that the Programs' influence on the success of the ET Pilots. However, because the Make Ready Credit Programs are proposed as permanent programs, EM&V would likely need to continue after the conclusion of the ET Pilot Programs.<sup>3</sup>

ii. Equity and Access

Further, NCSEA supports the equity and access issues that NCJC/SACE highlighted in their initial comments. Notably, NCSEA agrees: (1) on the importance for all customers to allow for providing for credits within one billing cycle of installation of the make-ready infrastructure<sup>4</sup>; that the Commission should direct Duke to make special efforts in its marketing and outreach to make the Make Ready Credit Program accessible to lower-income communities, rural residents, and communities of color<sup>5</sup>; that Duke should make special effort to ensure that its contractor network extends into rural areas<sup>6</sup>; and, that the school systems served by the Duke pilot programs have access to Make Ready Credit Programs to help further reduce the upfront costs of adopting electric buses and attendant charging infrastructure and, similarly, that Phase II Multi-family Level 2 Charging Programs are also approved and then paired with Make Ready Credit Programs to ease the transition.<sup>7</sup>

iii. Non-Residential Charger Suggestions

Finally, NCSEA generally supports NCJC/SACE's suggestions on non-residential Make Ready Credit Program changes. Namely that Duke should consider whether making

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<sup>3</sup> *Id.* at 5.

<sup>4</sup> *Id.* at 6.

<sup>5</sup> *Id.* at 6-7.

<sup>6</sup> *Id.* at 7.

<sup>7</sup> *Id.*

an inexpensive, incremental increase in the capacity of upgrades would allow for additional EV chargers down the road without additional upgrades.<sup>8</sup>

B. PUBLIC STAFF

NCSEA supports the following suggestions made by the Public Staff in their Initial Comments (“Public Staff Initial Comments”).

i. Monitoring

NCSEA agrees with the position and points made by the Public Staff regarding the monitoring of the Make Ready Credit Program and believe this suggestion mirrors, to some extent, the concerns laid out in by NCJC/SACE regarding EM&V and data reporting. Namely, NCSEA supports the Public Staff’s assertion that

The Public Staff is unclear how the Companies claim that the MRC Request creates a framework to manage the grid and properly address system upgrades necessary for wide-scale EV adoption without some level of monitoring. Regardless of whether or not additional metering is installed as part of the MRC Request, the Public Staff believes it is imperative that any MRC Request approved by the Commission include sufficient reporting and data analytics designed to determine the success of the program.<sup>9</sup>

Like the arguments made on behalf of an EM&V process, NCSEA agrees with the Public Staff that, as a new program, the Make Ready Credit Program requires data analysis to determine the efficacy of the programs over time. Accordingly, NCSEA supports this request from the Public Staff.

ii. Reporting

Relatedly, NCSEA supports the Public Staff’s suggestion for reporting requirements on the Make Ready Credit Program and the underlying collected data on costs and metrics for the program. The Public Staff succinctly lays out the request:

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<sup>8</sup> *Id.* at 7-8.

<sup>9</sup> Public Staff Initial Comments, p. 6.

The Public Staff also believes that the Companies should be required to file reports more often than annually as the Company suggests. The Public Staff recommends semiannual reports to be filed with the Commission and distributed to stakeholders on a semiannual basis and include (1) the amounts of the credits and the estimates of costs, which are tentative in nature and may need to be adjusted to maintain the balance between EVSE costs and EV loads;(2) adoption rates for each type of EVSE;(3) EV loads;(4) the costs observed per installation; (5) the revenue credits paid; (6) and any other distribution system cost impacts associated with EVSE deployment.<sup>10</sup>

NCSEA agrees with the Public Staff's suggestion with the caveat that the metrics and data reporting may be amended and improved over time as Duke, the Commission, and intervenors becomes more adept in the electric vehicle space and can recognize the changing needs of the consumer and ratepayers generally.

### C. CHARGEPOINT

As an initial point, NCSEA agrees with ChargePoint's greater thought: utility investment in electric vehicle charging infrastructure should complement the competitive market. As explained in NCSEA's Initial Comments on the Phase II Pilot Proposals, NCSEA believes that Duke should function as a market assistant and not a market participant in electric vehicle infrastructure.<sup>11</sup> Therefore, NCSEA supports ChargePoint's marketplace-enabling suggestions as well as some safety and consumer confidence suggestions.

#### i. Minimum Standards for EVSE

First, NCSEA agrees that the Make Ready Credit Program should establish minimum functional standards for qualified electric vehicle service equipment ("EVSE"). Namely, NCSEA agrees that smart chargers will be future-enabling for customers and that,

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<sup>10</sup> *Id.*

<sup>11</sup> *NCSEA's Initial Comments on Pilot Phase II Proposals*, p. 6 (July 29, 2021).

at a minimum, it makes sense for Duke to deploy minimum charging structures that require networked or smart chargers.<sup>12</sup>

ii. Energy Star Certification and Third-Party Equipment Certification

Further, NCSEA agrees with ChargePoint's recommendation that all Level 2 charging equipment be ENERGY STAR Certified:

ChargePoint recommends that all Level 2 charging equipment be ENERGY STAR certified. The US Environmental Protection Agency awards ENERGY STAR certification to EV charging equipment that meets specific efficiency standards in standby mode, meaning that a charger conserves energy when not actively charging. ENERGY STAR certified chargers can use up to 40% less energy than standard chargers while not in active use.<sup>13</sup>

NCSEA generally agrees with any position that will conserve energy and may reduce stress to the grid. The ENERGY STAR certification requirement would allow for needed conservation. NCSEA is also open to the suggestion of other certifications which function to similarly conserve energy.

NCSEA also supports ChargePoint's recommendation that charging equipment be certified for safety by a third-party testing laboratory.<sup>14</sup> NCSEA agrees that this practice will help keep consumers safe and enable consumer confidence in the installation of electric charging equipment.

## **II. CONCLUSION**

For all the reasons set forth herein and in NCSEA's Initial Comments on the Make Ready Credit Program, NCSEA requests the Commission approve the program with NCSEA's suggested changes and the suggested changes supported by NCSEA in these Reply Comments.

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<sup>12</sup> *Initial Comments of ChargePoint, Inc.*, pp. 10-11.

<sup>13</sup> *Id.* at 11.

<sup>14</sup> *Id.* at 12.

Respectfully submitted, this the 3rd day of August, 2021.

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**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing document by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party’s consent.

This the 3rd day of August, 2021.

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