



March 16, 2022

VIA ELECTRONIC FILING

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

**Re: Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's Application for Approval of Electric Vehicle Managed Charging Pilots
Docket Nos. E-7, Sub 1266 and E-2, Sub 1291**

The Vehicle-Grid Integration Council (VGIC)¹ is a 501(c)(6) nonprofit trade association focused on accelerating the role smart EV charging and discharging through policy development, education, outreach, and research. VGIC supports the transition to a decarbonized transportation and electric sector by ensuring the value from EV deployments and flexible EV charging and discharging is recognized and compensated in support of achieving a more reliable, affordable, and efficient electric grid.

VGIC is pleased to support Duke Energy's proposed EV Managed Charging Pilot and urges the North Carolina Utilities Commission to approve the proposal. VGIC believes that this innovative program will deliver value for program participants, utility ratepayers, and the grid, as well as generate valuable lessons learned to support the scaling of vehicle-grid integration (VGI) technologies in Duke Energy's service territory. The scaling of VGI programs and offerings will help accomplish the following public policy goals:

- **Benefit drivers and fleet owners** by reducing the total cost of EV ownership.
- **Decarbonize the transportation sector** by accelerating EV adoption.
- **Support the decarbonization of the power sector** by providing essential grid flexibility services as renewable energy and distributed energy resource penetration increases.
- **Increase affordability** by reducing electricity bills for all customers.

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., dcbel, Enel X North America, Inc., ENGIE NA, Fermata Energy, FlexCharging, Ford Motor Company, General Motors Company, Nissan, Nuvve Holding Corporation, Sacramento Municipal Utility District, Stellantis N.V., Sunrun, The Mobility House, Toyota Motor North America, Inc., Veloce Energy, Inc., and WeaveGrid. The views expressed in these comments are those of VGIC, and do not necessarily reflect the views of all individual VGIC member companies or supporters. (<https://www.vgicouncil.org/>).



- **Improve grid resiliency** and security during extreme weather events using vehicle-to-building systems.
- **Foster economic activity** through innovation, competition, and market transformation.

Additionally, since the delivery of meaningful system and customer benefits can only be achieved at scale, VGIC encourages Duke to ensure that there is a clear path towards scaling the program beyond the pilot phase if it is deemed successful. While utility managed charging for the pilot is reasonable, any future program should encourage third-party aggregators to serve this function. It is worth noting that only a small subset of vehicle models is eligible to participate under Duke’s proposal. Although VGIC supports this pilot as a first step, VGIC recommends that Duke should soon consider expanding eligibility to include other vehicles with similar telematics-based control technologies.

Lastly, VGIC recommends that Duke should continue to explore additional VGI offerings beyond the proposed pilot. Commercial EV fleets with predictable operational schedules may similarly have the potential for the coordination and optimization of EV charging and should be considered in future program offerings. EVs can also utilize bidirectional capabilities to provide on-site backup power and behind-the-meter customer bill management (vehicle-to-building, or V2B) as well as exports to the grid (vehicle-to-grid, or V2G) which can enhance system reliability. A portfolio of VGI offerings that cover all customer segments and that leverage both unidirectional and bidirectional capabilities will help maximize the grid and customer value of EVs.

VGIC appreciates the opportunity to provide these comments and looks forward to working with Duke and the Commission to ensure that EVs are fully leveraged to support North Carolina’s decarbonization goals.

Respectfully submitted,

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Policy Specialist

Vehicle-Grid Integration Council (VGIC)