

December 24, 2019

VIA EMAIL

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

**Re: Docket No. 19-035-T16: In the Matter of Rocky Mountain Power’s Proposed
Tariff Revisions to Schedule 120, Plug-in Electric Vehicle Incentive Pilot
Program**

Reply Comments of Southwest Energy Efficiency Project and Utah Clean Energy

Southwest Energy Efficiency Project (SWEEP) and Utah Clean Energy (UCE) submit these reply comments to the Public Service Commission of Utah (“the Commission”) in response to comments filed by ChargePoint, Inc. on December 17, 2019.

SWEEP and UCE support ChargePoint’s recommendation to modify the non-residential and multi-family Level 2 charger incentive to include both the charger and installation costs. Level 2 charging station hardware can cost anywhere from \$400 to \$2,400 depending on the design and functionality,¹ but the cost to install a charging station is typically much higher, particularly in multi-family residential and commercial applications. According to a recent report from the California Electric Transportation Coalition, the average cost to retrofit an existing multi-family or commercial parking space with “EV-Capable” infrastructure ranges from \$3,091 to \$9,247 per parking space.² These EV-Capable costs include electrical panel upgrades, raceway installation, demolition, asphalt and pavement construction, and permitting and inspection fees, but not the cost of the charger itself.

The purchase price of an EV is higher than for a comparable gas-powered vehicle, and the additional cost to install the necessary electrical equipment to accommodate an EV charger can make the technology prohibitively expensive. RMP’s Plug-In Electric Vehicle Incentive Program should address this cost barrier by allowing customers to use the non-residential and multi-family Level 2 charger incentive to cover both the charger and installation costs.

¹ GreenBiz, “RMI: What’s the true cost of EV charging stations?” May 8, 2014.
<https://www.greenbiz.com/blog/2014/05/07/rmi-whats-true-cost-ev-charging-stations>.

² Energy Solutions, “Plug In Electric Vehicle Infrastructure Cost Analysis Report for CALGreen Nonresidential Update,” prepared for California Electric Transportation Coalition. September 16, 2019. Table ES-1, page 2.
<https://caletc.com/wp-content/uploads/2019/10/CALGreen-2019-Supplement-Cost-Analysis-Final-1.pdf>.

Second, SWEEP and UCE agree with ChargePoint's recommendation to clarify that RMP's proposed per-project cap applies to individual meters, and not to the corporate entities installing the chargers. RMP states that "for DC Fast Chargers, the EV Program currently caps customers' annual incentive at \$75K."³ RMP proposes to extend this \$75,000 per-customer cap to apply to non-residential and multi-family Level 2 charger incentives. We believe that RMP's charging incentive program should support the development of a large regional charging network with a variety of different locations and amenities for EV drivers. Corporations and developers should be encouraged to deploy multiple charging stations at each of their facilities to provide convenient access to charging for multiple use groups and expand the geographic diversity of charging stations. An annual cap of \$75K per corporate entity (rather than per meter) could inhibit the installation of new charging stations at different locations throughout the state.

Respectfully submitted,

/s/ Matt Frommer

Senior Transportation Associate

Southwest Energy Efficiency Project

³ Docket No. 19-035-T16, RMP Proposed Changes to Schedule 120, Plug-in Electric Vehicle Incentive Pilot Program. November 18, 2019. Page 2.

CERTIFICATE OF SERVICE

Docket No. 19-035-T16

I hereby certify that on December 24, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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Respectfully submitted,

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