

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Rocky Mountain Power's Proposed Tariff Revisions to Schedule 120, Plug-in Electric Vehicle Incentive Pilot Program	<u>DOCKET NO. 19-035-T16</u> <u>ORDER</u>
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ISSUED: December 31, 2019

On November 18, 2019, Rocky Mountain Power (RMP) filed Advice No. 19-16 (“Application”) proposing revisions to its Plug-in Electrical Vehicle Incentive Program (“EV Program”) administered under Tariff P.S.C.U. No. 50 (“Tariff”) Electric Service Schedule No. 120, Plug-in Electric Vehicle Incentive Pilot Program (“Schedule 120”). RMP’s proposed modifications to Schedule 120, Sheet Nos. 120.1 and 120.2 include adding a new AC Level 2 (“L2”) incentive for residential customers and certain charger and per project cap conditions. For non-residential and multi-family L2 chargers, RMP proposes to decrease existing incentives¹ and add an annual customer incentive cap.² According to RMP, the Application is intended to address unintended outcomes where customers may be able to receive incentives from RMP and the Utah Department of Environmental Quality (DEQ)³ greater than the purchase and installation costs of the charging equipment. Further, the new L2 residential offering is designed to address

¹ Note: RMP’s changes to existing incentives for non-residential and multi-family L2 chargers shown in Table 2 of its Application are not identified on the Tariff Sheets but rather on RMP’s EV-related web pages.

² Application at 3.

³ According to RMP, during the 2019 General Session, the Utah Legislature appropriated \$4.9 million to be used as an incentive for the installation of Electric Vehicle Supply Equipment (“EVSE”) throughout the state, administered through the DEQ. The DEQ’s incentive program allows businesses, non-profit organizations, and other governmental entities to apply for a grant for reimbursement of up to 50 percent of the purchase and installation costs for a pre-approved EVSE project. Funds can be used for the purchase and installation of both L2 and DC Fast Charging equipment.

Level 1 charger overnight charging limitations. RMP requested an effective date of December 18, 2019 for these changes.

On November 20, 2019, the PSC issued a Notice of Filing and Comment Period. On November 25, 2019, ChargePoint, Inc. (“ChargePoint”) requested intervention and moved to extend the procedural schedule by two weeks. On November 26, 2019, the PSC issued a Second Notice of Filing and Comment Period and Order Suspending Tariff. The PSC received comments from the Division of Public Utilities (DPU), the Office of Consumer Services (OCS), Siemens, ChargePoint, and jointly from Southwest Energy Efficiency Project (SWEEP) and Utah Clean Energy (UCE) (“SWEEP/UCE”). The PSC received reply comments from RMP, the DPU, ChargePoint, and SWEEP/UCE.

COMMENTS

The DPU recommends the PSC approve RMP’s proposed changes to the EV Program because they are reasonable and in the public interest. Likewise, the OCS recommends approval. Further, the OCS recommends that RMP provide time of use (“TOU”) rate information to residential customers that receive an incentive.

Siemens recommends the PSC approve RMP’s modifications to the EV Program subject to the following: (1) Consider the use of open technical standards to ensure charger interoperability and open payment standards for public charging; and (2) require chargers to be “Smart” in order to support the grid and provide charger usage data.

ChargePoint recommends the PSC in its final order: (1) Maintain RMP’s existing per-charger maximum incentive levels of \$2,500 and \$3,500 for non-residential single port and dual port chargers, respectively; (2) specify that RMP’s proposed incentive cap for non-residential L2

chargers includes both charger and installation costs; (3) codify and expand RMP's existing practice of requiring the charging technology that aligns with leading industry best practices and that will ensure the incentivized chargers will be able to participate in any new programs RMP may offer in the future, *i.e.*, that L2 chargers be UL listed, ENERGY STAR certified, and Smart; and (4) increase the incentive amount for residential L2 chargers from \$200 to \$600 per charger.

In its reply comments, ChargePoint provides support for SWEEP/UCE's recommendations with the caveat that the 75 percent incentive cap for L2 charging stations should include both charger and installation costs. In response to Siemens' comments, ChargePoint asserts the PSC should resist making any specific technology requirements on charging stations without both evidence and a robust discussion of the merits of the technologies. ChargePoint asserts there is no record in this docket to support any other requirements other than its recommendations related to UL listing, ENERGY STAR certification, and the charger being Smart.

SWEEP/UCE support RMP's proposed new residential offering as well as RMP's proposed cap on customer incentives and recommend the PSC partially approve RMP's proposed changes to the EV Program. SWEEP/UCE also recommend the PSC: (1) Direct RMP to create a permanent Electric Vehicle TOU rate structure by 2021 based on the findings from the EV pilot; (2) explore smart charging opportunities; (3) maintain existing program incentive levels; (4) direct RMP to develop new program elements that expand electric transportation access for disadvantaged and low-income customers; and (5) encourage RMP to increase the scale of investment in transportation electrification beyond the pilot phase.

SWEEP/UCE support ChargePoint's recommendations related to modifying the non-residential and multi-family Level 2 charger incentive to include both the charger and installation costs and that RMP should clarify that the proposed per-project cap applies to individual meters, and not to the corporate entities installing the chargers.

In reply, RMP commits that it will take steps to ensure participating residential customers are informed of TOU options. RMP argues against adoption of other parties' recommendations for reasons including: (1) the intent, scope, timing, and budget of the current EV Program; (2) cost barriers for smart chargers; (3) the possibility of over-incentivizing AC L2 customers and RMP's expectations for higher participation due to additional funds being available; (4) consistency with the DEQ's program; and (5) the applicability of existing incentives and availability of custom incentives.

RMP explains it will compile and analyze the findings obtained from market and TOU data to help inform any subsequent programs and offerings for electric vehicles and associated equipment. Further, RMP anticipates working with interested parties on future program design, TOU rate structure, cost-benefit analysis methodology, and other relevant items such as technology and payment standards. RMP states it will continue to analyze the EV Program and modify it as necessary to maintain a well-balanced, prudent program focused on the installation of EV charging infrastructure and TOU rates. RMP recommends the PSC approve its proposed tariff sheets as filed, effective January 1, 2020.

FINDINGS AND CONCLUSIONS

In light of the pilot status and term of the EV Program, the customer choice requirements of Utah Code Ann. § 54-20-103, the budgetary constraints of the EV Program identified in Utah

Code Ann. § 54-7-12.8(6)(b) and approved in Docket No. 16-035-36,⁴ RMP's comments addressing its discussions with the DEQ, RMP's current and forecast EV Program participation, and RMP's concerns with program management, we find RMP's reply comments support its proposed changes to the EV Program as filed. In addition, RMP's commitments will ensure that parties' concerns will be addressed in either the EV Program evaluation or the development of future programs and offerings of this type.

Based on the comments and recommendations filed in this docket, including RMP's commitments regarding dissemination of information on TOU rates and working with stakeholders on future EV-related programs and offerings, we find and conclude RMP's Application and proposed Tariff sheet revisions are just, reasonable, and in the public interest. Therefore, we approve them.

ORDER

1. We approve RMP's proposed changes to Electric Service Schedule No. 120, Sheet Nos. 120.1 and 120.2 filed on November 18, 2019, effective January 1, 2020.
2. RMP shall file updated Tariff Sheet Nos. 120.1 and 120.2 with the correct effective date by January 15, 2020.

DATED at Salt Lake City, Utah, December 31, 2019.

/s/ Michael J. Hammer
Presiding Officer

⁴ *In the Matter of the Application of Rocky Mountain Power to Implement Programs Authorized by the Sustainable Transportation and Energy Plan Act* (Phase Three Report and Order issued June 28, 2017); Docket No. 16-035-36.

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Approved and Confirmed December 31, 2019, as the Order of the Public Service

Commission of Utah.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg

PSC Secretary

DW#311624

Notice of Opportunity for Agency Review or Rehearing

Pursuant to §§ 63G-4-301 and 54-7-15 of the Utah Code, an aggrieved party may request agency review or rehearing of this Order by filing a written request with the PSC within 30 days after the issuance of this Order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC does not grant a request for review or rehearing within 20 days after the filing of the request, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a petition for review with the Utah Supreme Court within 30 days after final agency action. Any petition for review must comply with the requirements of §§ 63G-4-401 and 63G-4-403 of the Utah Code and Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on December 31, 2019, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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