

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

| | |
|---|--|
| In the Matter of Rocky Mountain Power's Proposed Changes to Regulation No. 4 "Supply and Use of Service" to Add Language Clarifying that Electric Vehicle (EV) Battery Charging Service is Not Considered Resale of Electricity | DOCKET NO. 13-035-T12 Initial Comments of the Southwest Energy Efficiency Project, Utah Clean Energy, et. al. |
|---|--|

On September 6th, Rocky Mountain Power filed proposed tariff sheets regarding P.S.C.U No. 49. The Company proposed adding new language to Electric Service Regulation 4 to clarify that "electric vehicle (EV) battery charging service is not considered resale of electricity."

SWEEP, Utah Clean Energy and the other organizations and entities listed below support the adoption of the language proposed by Rocky Mountain Power. This proposed language would allow Electric Vehicle Supply Equipment (EVSE) owners and operators additional flexibility in how they provide and sell electricity to EV owners at public charging stations. Under current regulations, only entities regulated as utilities are able to sell electricity to the public on a \$/kWh basis, which restricts the ability of EVSE owners to find a business model that works for them. The adoption of this language will help to open up the market for electric vehicle charging stations and result in more public charging station in Utah. Policies that expand the network of charging stations will give EV drivers the confidence to take longer trips and give more people the confidence to purchase an electric vehicle. As electric vehicles can significantly reduce emissions of criteria pollutants compared to gasoline vehicles, the adoption of more electric vehicles will help the region address its air quality problems.

SWEEP and UCE appreciate the opportunity to submit these comments. If the Commission has questions about the comments described herein, please contact the following individuals for additional information or resources:

Kevin Emerson, MSc
Senior Policy & Regulatory Associate
Utah Clean Energy
(801) 363-4046
kevin@utahcleanenergy.org

Mike Salisbury
Transportation Analyst
Southwest Energy Efficiency Project
(303) 477-3738
msalisbury@swenergy.org

Will Toor
Director, Transportation Programs
Southwest Energy Efficiency Project
(303) 447-0078
wtoor@swenergy.org

The following entities have reviewed these comments and also support the Company's proposed tariff and are, therefore, listed as signatories to these comments:

Ralph Becker, Mayor
Salt Lake City Corporation
801-535-7704
mayor@slcgov.com

Robin Erickson, Executive Director, Southern Coordinator
Irene Rizza, Communications & Northern Coordinator
Utah Clean Cities Coalition
(801) 381-7691
robin.erickson@UtahCleanCities.org

Kathy Van Dame, Policy Coordinator
Wasatch Clean Air Coalition
(801)261-5989
dvd.kvd@juno.com