

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER TO
IMPLEMENT PROGRAMS AUTHORIZED
BY THE SUSTAINABLE
TRANSPORTATION AND ENERGY PLAN
ACT

DOCKET No. 16-035-36

ChargePoint Exhibit 1SR

PHASE 3

SURREBUTTAL TESTIMONY

OF

JAMES ELLIS

ON BEHALF OF

CHARGEPOINT, INC.

May 16, 2017

1 **Q: Please state your name and address.**

2 A: My name is James Ellis. I reside at 6215 Robin Hill Rd in Nashville, Tennessee.

3 **Q: Have you filed testimony previously in this docket?**

4 A: Yes. I filed direct testimony in this docket on behalf of ChargePoint, Inc. on April 6,
5 2017.

6 **Q. What is the purpose of your surrebuttal testimony?**

7 A. The purpose of my surrebuttal testimony is to respond to Rocky Mountain Power witness
8 William J. Comeau's claim beginning on line 158 of his rebuttal testimony that a PEV
9 Program that only incents communicating chargers would not promote customer choice.
10 In addition, I respond to Office of Consumer Services witness Cheryl Murray's
11 opposition to ChargePoint's recommendation starting on line 263 that all supported home
12 charging units be "smart."

13 **Q. Do you disagree with Mr. Comeau's recommendation that the PEV Program**
14 **support both communicating and non-communicating Level 2 chargers?**

15 A. Yes. ChargePoint reiterates its recommendation that the PEV Program only incent Level
16 2 communicating, or networked charging stations. It is critical to ensure that any
17 ratepayer-funded investment in electric vehicle charging infrastructure be justified by the
18 benefits these investments would have for all ratepayers. RMP does not adequately
19 justify why non-communicating chargers should receive ratepayer-funded incentives.
20 ChargePoint lauds RMP for requiring data collection of DC fast charging assets in its EV
21 program. Data collection provides the full spectrum of charger utilization and generates
22 grid benefits, helping the utility maintain visibility of unplanned load growth and enhance
23 distribution planning to support grid reliability. For any utility program to have incentives

24 supported by all ratepayer funds, generating grid benefits is absolutely necessary to
25 warrant such investment. While the value of electric vehicle charging has the potential to
26 provide significant grid benefits, in order to realize those benefits, the Company should
27 collect data in order to view, analyze, understand and appropriately respond to EV
28 charging utilization to better integrate electric vehicles and operate the grid.

29 The benefit of networked charging stations is not only the ability to provide access to
30 charging data, but also to enable participation in load management and time-varying
31 pricing tariffs that are offered by the utility. Network charging stations allow customers
32 to schedule and automate their charging sessions based on different price signals, such as
33 TOU rates. This helps ensure that RMP receive the intended customer response and
34 behavior through the design of the TOU pilot.

35 **Q. Are there other reasons you disagree with RMP’s proposal that the PEV Program**
36 **support both communicating and non-communicating Level 2 chargers?**

37 A. Yes. Communicating or “smart” chargers include embedded meters, which can be used to
38 measure and collect charger utilization data and even support specific EV rates without
39 added cost to the station. These smart chargers also eliminate the need to install an
40 additional utility meter to the home to enable a separate EV rate, which does add further
41 cost burdens on ratepayers. The benefits of these connected stations with embedded
42 meters goes beyond just a TOU pilot, but further supports expanded capabilities of
43 utilizing these networked charging stations to dynamically manage the EV charging load
44 in a way that best benefits RMP’s grid needs, such as EV-specific demand response
45 programs. Utility EV programs should incent getting the right tools in place, so that the
46 tools can continue to generate grid benefits as the EV market grows. These programs

47 should leverage the embedded meter capabilities of multiple networked charging station
48 providers in the market which provides customer choice of qualified equipment. Contrary
49 to the concern Mr. Comeau expressed, this would ensure that RMP's program promotes
50 customer choice and market competition while incenting tools to enable grid benefits.
51 These types of program design considerations and offerings are critical to ensure that as
52 EV adoption increases in Utah, the charging infrastructure that is in place is capable of
53 supporting charging activities and grid integration in ways that do not adversely impact
54 the existing distribution system or add costs to ratepayers.

55 **Q. What is your response to Ms. Murray's concern that "smart" home charging units**
56 **impose additional costs on residential customers?**

57 A. ChargePoint's Level 2 residential charging station products are networked and include
58 embedded metering capabilities at no additional cost. The starting price for our Level 2
59 charging station is \$499 and there is no additional cost to utilize the "smart" functions of
60 these residential charging stations. These functions include collecting charging data, as well
61 as the ability to utilize the embedded meter data for billing settlement in the TOU pilot. For
62 these reasons, the Office need not oppose ChargePoint's recommendation that the PEV
63 Program only support smart home charging units. Nor is there any justification for RMP's
64 recommendation to add an additional costly \$200 meter per customer for participation in the
65 TOU pilot if the Commission qualifies the right charging station functionality for the
66 program.

67 **Q. Does this conclude your surrebuttal testimony?**

68 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2017, I sent a copy of the foregoing surrebuttal testimony of James Ellis for ChargePoint, Inc. in Phase 3 of Docket No. 16-035-36 by electronic mail to the following:

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