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November 18, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attn: Gary Widerburg
Commission Secretary

RE: Advice No. 19-16
Proposed Changes to Schedule 120, Plug-in Electric Vehicle Incentive Pilot Program
Docket No. 19-035-T16

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 50 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of December 18, 2019 for these changes.

First Revision of Sheet No. 120.1	Schedule 120	Plug-in Electric Vehicle Program
First Revision of Sheet No. 120.2	Schedule 120	Plug-in Electric Vehicle Program

The purpose of this filing is to propose changes to the Plug-in Electric Vehicle Program (“EV Program”) administered through Electric Service Schedule No. 120, specifically to adjust existing incentives, add customer project cap capability, and add a new offering for residential customers. Proposed changes to the Schedule 120 tariff sheets are included as Exhibit A.

DESCRIPTION OF CHANGES

Adjustments to Existing Incentives

During the 2019 General Legislative Session, the State 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 Utah Department of Environmental Quality (“DEQ”). 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 AC Level 2 and DC Fast Charging equipment.

The equipment incented by the DEQ is also incented by the Company’s EV Program, which has created the unintended outcome in certain situations where customers may be able to receive more money through incentives than the actual cost of the equipment they have purchased and installed. For example, if a customer purchased and installed four single port DC Fast Chargers for \$160k, the customer could get 50 percent of that cost incented by the DEQ, amounting to \$80k. However, the DEQ’s program caps incentives at \$75k, so the customer’s incentive in this example would be reduced to \$75k so the cap was not exceeded. That same customer could then also apply for an incentive through the EV Program, which currently provides \$30k per single port DC Fast Charger up to 75 percent of the total charger and installation costs. If per project caps were not enabled for this offering, which are discussed in the Program Controls section below, the customer’s incentive from the EV Program would be \$120k (\$30k x 4 units). In this example, the participating customer could receive a grand total of \$195k in incentives between the EV Program and the DEQ’s program, while the project itself only cost the customer \$160k.

For another example, if a customer purchased 20 dual port AC Level 2 Chargers for \$100k, the customer could get 50 percent of that cost incented by the DEQ, amounting to \$50k. That same customer could also apply for the EV Program incentive, which currently provides \$3,500 per dual port AC Level 2 Charger up to 75 percent of the total charger cost. The customer’s incentive from the EV Program would be \$70k (\$3,500 x 20 units). In this example, the participating customer could receive a grand total of \$120k in incentives between the EV Program and DEQ’s program, while the project itself only cost the customer \$100k. Table 1 below summarizes the examples described above.

Table 1 – Customer Incentive Examples

Measure	Number of Units	Equipment Cost	DEQ Incentive	RMP Incentive	Total Customer Incentive	% of Total Cost
DC Fast Charger (Single Port)	4	\$160,000	\$75,000	\$120,000 ¹	\$195,000	122%
AC Level 2 Charger (Dual Port)	20	\$100,000	\$50,000	\$70,000	\$120,000	120%

The examples above result in the customer receiving tens of thousands of dollars more than the actual cost of the equipment, which is not the intent of the DEQ’s program or the EV Program. To address these unintended scenarios, it is proposed to decrease incentives for non-residential & multi-family AC Level 2 Chargers, as well as add project caps for these offerings as an additional control. Participation in the EV Program has also grown steadily since inception, and decreasing incentives will also allow for additional participation and equipment to be installed within the EV Program’s budget. Table 2 below summarizes the proposed adjustments. Note that the maximum amounts in Schedule 120 are not changing, only the offered amounts to customers.

Table 2 – Proposed Adjustments to Existing Incentives

Category	Measure	Current Incentive	Proposed Incentive
Plug-in Electric Vehicle Charging Stations	Non-Residential & Multi-Family AC Level 2 Charger		
	Single Port	\$2,500	\$1,000
	Multi-Port	\$3,500	\$1,500

Note: Per Schedule 120, incentive amounts are per charger up to 75% of total charger cost.

¹ This example assumes no project caps for the EV Program’s DC Fast Charger prescriptive incentive.

Program Controls

As noted above, prescriptive incentive amounts for AC Level 2 and DC Fast Chargers are on a per charger basis up to 75 percent of total charger cost. The Company is coordinating with the DEQ so it will be known which customers are participating in each program, and has clarified on the Company's website that the 75 percent cap takes into account incentives from all funding sources, such as state, federal, and utility, which will further prevent over-incentivizing customers. For example, using the same DC Fast Charger example above, if a customer purchased and installed four single port DC Fast Chargers for \$160k, and the customer received a \$75k incentive from the DEQ, the EV Program's incentive would be capped at \$45k pursuant to the 75 percent cap. The total customer incentive in this example would be \$120k, or 75 percent of the total eligible project cost of \$160k.

The Special Conditions section of Schedule 120 specifies that pre-approval criteria for DC Fast Charger prescriptive incentives includes the number of chargers and per project caps.² This condition helps to spread out customer incentives and prevent runs on the EV Program so no single customer can deplete a significant amount of EV Program funding. For DC Fast Chargers, the EV Program currently caps customers' annual incentive at \$75k. The DEQ program also caps customer incentives at \$75k, as previously mentioned above. To illustrate this cap, if a customer purchased ten DC Fast Chargers for \$400k, the DEQ's incentive would be the maximum \$75k instead of 50 percent, which would have been \$200k. The EV Program's incentive in this example would likewise be the maximum \$75k, for a total customer incentive of \$150k between the DEQ and EV Program. Without the \$75k cap, the EV Program would pay \$225k, depleting a significant amount of the DC Fast Charger prescriptive budget. The two examples just described are summarized in Table 3 below.

Table 3 – Customer Incentive Examples with Project Caps

Measure	Number of Units	Equipment Cost	DEQ Incentive	RMP Incentive	Total Customer Incentive	% of Total Cost
DC Fast Charger (Single Port)	4	\$160,000	\$75,000	\$45,000	\$120,000	75%
	10	\$400,000	\$75,000	\$75,000 (with cap)	\$150,000 (with cap)	38%
				\$225,000 (w/out cap)	\$300,000 (w/out cap)	75%

The EV Program is starting to see customer applications for high amounts of AC Level 2 Chargers, and as such, it is proposed to add the same Special Condition for these prescriptive incentives to enable the Company to cap customers' annual incentives, based upon budget availability. Having the ability to enable per project caps for these prescriptive incentives will prevent runs on this offering and help EV Program funding last throughout the year.

² Sheet 120.2, Non-Residential and Multi-Family DC Fast Charger Prescriptive Incentive 3(f).

New Offering for Residential Customers

As battery technology advances, the capacity of electric vehicle batteries is increasing and creating a need for residential customers to be able to charge their vehicles faster at home. For many electric vehicles, charging overnight with a basic Level 1 Charger will not provide a full charge. To help alleviate this issue, it is proposed to add a new offering to the EV Program for residential AC Level 2 Chargers. The maximum incentive will be \$200 per charger with an initial offering of \$200 up to 75 percent of total charger and/or installation cost. Table 4 below summarizes this new offering.

Table 4 – Proposed Residential Offering

Category	Measure	Initially Offered Incentive	Maximum “up to”
Plug-in Electric Vehicle Charging Stations	Residential AC Level 2 Charger (For Customers on Schedules 1, 2, 2E, and 3)	\$200	\$200 per charger up to 75% of total charger and/or installation cost

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Blvd., Suite 2000
Portland, OR 97232

Informal inquiries regarding this matter may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow
Manager, Regulatory Affairs

Enclosures

Exhibit A

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 120

STATE OF UTAH

Plug-in Electric Vehicle Incentive Pilot Program

PURPOSE: This Schedule is intended to promote plug-in electric vehicle charging infrastructure and Time of Use (TOU) rates.

APPLICABLE: To Rocky Mountain Power and all Customers taking service under the Company’s General Service Schedules 1, 2, 2E, 3, 6, 6A, 6B, 7, 8, 9, 9A, 10, 11, 12, 15, 21, 23, 31, and 32.

CUSTOMER PARTICIPATION: Customer participation is voluntary and is initiated by following the participation procedures on the Company website. The Company shall have the right to qualify participants, at its discretion, based on criteria the Company considers necessary to ensure the effective operation of the measures, utility system, and program budget. Program details, requirements, and current incentive levels can be viewed on the Company’s website at www.rockymountainpower.net/pev.

Table 1 – Plug-in Electric Vehicle (PEV) Program Offerings

Category	Measure	Incentives “up to”
Residential Time of Use Pilot Program	Participation in Residential Time of Use Rate Electric Service Schedule 2E	\$200 per customer
Plug-in Electric Vehicle Charging Stations	<u>Residential AC Level 2 Charger (For Customers on Schedules 1, 2, 2E, and 3)</u>	<u>\$200 per charger up to 75% of total charger and/or installation cost</u>
	Non-Residential & Multi-Family AC Level 2 Charger	Single Port \$4,000 per charger up to 75% of total charger cost
		Multi-Port \$7,000 per charger up to 75% of total charger cost
	Non-Residential & Multi-Family DC Fast Charger	Single Port \$45,000 per charger up to 75% of total charger and installation costs
	Multi-Port \$63,000 per charger up to 75% of total charger and installation costs	
Custom	Non-Residential & Multi-Family Grant-Based Custom Projects and Partnerships	Custom

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Docket Advice~~ No. ~~46-035-3619-16~~

FILED: ~~May 16, 2017~~ November 18, 2019 **EFFECTIVE:** ~~July 1, 2017~~ December 18, 2019

ELECTRIC SERVICE SCHEDULE NO. 120 – Continued

AVAILABILITY: Availability for incentives listed in Table 1 above is subject to available funds. Availability of funds will be listed on the Company website and updated on a monthly basis.

SPECIAL CONDITIONS:

Time of Use Rate:

1. Eligibility criteria for participation may include, but is not limited to:
 - a. Customers must meet all participation requirements and special conditions established in Electric Service Schedule 2E.
2. Participation incentives for Electric Service Schedule 2E will be provided to customers shortly after enrollment.
3. Participants in the Time of Use Load Research Study are eligible for an additional incentive payment, as specified in Electric Service Schedule 121.

Residential, Non-Residential and Multi-Family AC Level 2 Charger Prescriptive Incentive:

1. To be eligible for an incentive, Customers must submit a Program Administrator approved post-purchase application and meet all Program requirements.
2. Incentives will be available on a first come first served basis with an annual cap.
3. The Company and its agents reserve the right to inspect installations.
- 3-4. Applications may be subject to charger and per project caps.

Non-Residential and Multi-Family DC Fast Charger Prescriptive Incentive:

1. To be eligible for an incentive, Customers must submit a Program Administrator approved application(s), provide all required documentation, and receive pre-approval.
2. Equipment purchased or installed prior to receipt of the Company's pre-approval may not be eligible for incentives.
3. Pre-approval criteria may include, but is not limited to:
 - a. Location variables such as proximity to other DC Fast Chargers;
 - b. Overall benefits to the public;
 - c. Costs of project and incentive amount;
 - d. Technology being used;
 - e. Availability to the public; and
 - f. Number of chargers and per project caps.
4. Incentives will be available on a first come first served basis with an annual cap.
5. Customers must consent to provide charger usage data.

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ELECTRIC SERVICE SCHEDULE NO. 120 – Continued

6. The Company and its agents reserve the right to inspect installations.

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~~035-3619-16~~

FILED: ~~May 16, 2017~~November 18, 2019 **EFFECTIVE:** ~~July 1, 2017~~December 18, 2019

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 120
STATE OF UTAH
Plug-in Electric Vehicle Incentive Pilot Program

PURPOSE: This Schedule is intended to promote plug-in electric vehicle charging infrastructure and Time of Use (TOU) rates.

APPLICABLE: To Rocky Mountain Power and all Customers taking service under the Company’s General Service Schedules 1, 2, 2E, 3, 6, 6A, 6B, 7, 8, 9, 9A, 10, 11, 12, 15, 21, 23, 31, and 32.

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Table 1 – Plug-in Electric Vehicle (PEV) Program Offerings

Category	Measure	Incentives “up to”	
Residential Time of Use Pilot Program	Participation in Residential Time of Use Rate Electric Service Schedule 2E	\$200 per customer	
Plug-in Electric Vehicle Charging Stations	Residential AC Level 2 Charger (For Customers on Schedules 1, 2, 2E, and 3)	\$200 per charger up to 75% of total charger and/or installation cost	
	Non-Residential & Multi-Family AC Level 2 Charger	Single Port	\$4,000 per charger up to 75% of total charger cost
		Multi-Port	\$7,000 per charger up to 75% of total charger cost
	Non-Residential & Multi-Family DC Fast Charger	Single Port	\$45,000 per charger up to 75% of total charger and installation costs
Multi-Port		\$63,000 per charger up to 75% of total charger and installation costs	
Custom	Non-Residential & Multi-Family Grant-Based Custom Projects and Partnerships	Custom	

(continued)

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FILED: November 18, 2019

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ELECTRIC SERVICE SCHEDULE NO. 120 – Continued

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Time of Use Rate:

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2. Incentives will be available on a first come first served basis with an annual cap.
3. The Company and its agents reserve the right to inspect installations.
4. Applications may be subject to charger and per project caps.

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1. To be eligible for an incentive, Customers must submit a Program Administrator approved application(s), provide all required documentation, and receive pre-approval.
2. Equipment purchased or installed prior to receipt of the Company's pre-approval may not be eligible for incentives.
3. Pre-approval criteria may include, but is not limited to:
 - a. Location variables such as proximity to other DC Fast Chargers;
 - b. Overall benefits to the public;
 - c. Costs of project and incentive amount;
 - d. Technology being used;
 - e. Availability to the public; and
 - f. Number of chargers and per project caps.
4. Incentives will be available on a first come first served basis with an annual cap.
5. Customers must consent to provide charger usage data.
6. The Company and its agents reserve the right to inspect installations.

(continued)

CERTIFICATE OF SERVICE

Advice No. 19-16
Docket No. 19-035-T16

I hereby certify that on November 18, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov

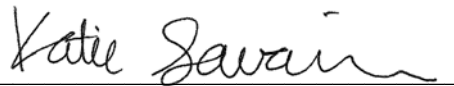
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Rocky Mountain Power

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Katie Savarin
Coordinator, Regulatory Operations