

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of Rocky  
Mountain Power for Approval of Electric  
Vehicle Infrastructure Program (EVIP)

)  
) **Docket No. 20-035-34**  
)  
) **Direct Testimony of**  
) **Alex Ware**  
) **On behalf of the**  
) **Office of Consumer Services**  
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October 19, 2021

1 **INTRODUCTION AND BACKGROUND**

2 **Q. WHAT IS YOUR NAME, OCCUPATION AND BUSINESS ADDRESS?**

3 A. My name is Alex Ware. I am a utility analyst with the Utah Office of  
4 Consumer Services (OCS). My business address is 160 East 300 South,  
5 Salt Lake City, Utah 84111.

6

7 **Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

8 A. I earned a Masters of Public Policy and B.S. in Economics from the  
9 University of Utah. I previously was employed as a performance auditor  
10 for the Utah Office of the Legislative Auditor General, where my duties  
11 involved conducting in-depth compliance, financial, and efficiency and  
12 effectiveness audits of various state funded agencies and programs.  
13 Those audits and associated recommendations were presented before the  
14 Legislative Audit Subcommittee. I have worked for the OCS since 2018  
15 and completed utility analyst training courses from New Mexico State  
16 University, Michigan State University, and the University of Wisconsin. I  
17 have previously submitted testimony before the Utah Public Service  
18 Commission (PSC) on a number of occasions in my capacity as a utility  
19 analyst for the OCS.

20

21 **Q. WILL YOU PLEASE PROVIDE A BRIEF OVERVIEW OF ROCKY**  
22 **MOUNTAIN POWER'S (RMP) APPLICATION IN THIS DOCKET?**

23 A. Yes. Pursuant to Utah Code § 54-4-41, Recovery of Investment in Utility-  
24 Owned Vehicle Charging Infrastructure (effective July 1, 2021), RMP  
25 requests approval of the PSC to create an Electric Vehicle Infrastructure  
26 Program (EVIP). The EVIP would span ten years and utilize \$50 million  
27 collected from ratepayers. In its application, RMP explains there are four  
28 parts of its EVIP proposal<sup>1</sup>:

29

30 1. Company-Owned Chargers: RMP proposes to build 20 to 25  
31 charging station locations during the first five years of the program.

32

33 2. Make-Ready Infrastructure: RMP proposes to provide infrastructure  
34 between the utility grid and vehicle chargers to customers through  
35 an application process.

36

37 3. Incentives: RMP proposes to continue vehicle charger incentives  
38 under Tariff Schedule 120 which was created in 2017 through the  
39 Sustainable Transportation and Energy Plan (STEP) program.

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<sup>1</sup> Docket No. 20-035-34, Application, p.5 to 7.

41           4. Innovation Partnerships and Projects: RMP states that it will work  
42           with a number of organizations to create an “enduring regional  
43           electric vehicle ecosystem” that has the latest technology.

44

45   **Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

46    A.    The purpose of my testimony is to show that RMP’s application to create  
47    the EVIP is not in the public’s interest as filed and requires changes before  
48    it should be considered for approval by the PSC. Specifically, I will  
49    address my concerns regarding the following topics:

50

- 51           • Reporting requirements
- 52           • Extension and evaluation of Schedule 2E
- 53           • Electric Vehicle Charging Education
- 54           • Extension of Schedule 120
- 55           • Tariff language within proposed Schedule 60

56

57           I note that my silence on an issue in RMP’s application and proposed  
58           tariffs under consideration in this docket should not be assumed to be tacit  
59           agreement.

60

61 **CONCERNS REGARDING REPORTING REQUIREMENTS**

62 **Q. DOES RMP'S APPLICATION UNDER CONSIDERATION IN THIS**  
63 **DOCKET CLEARLY ESTABLISH REPORTING REQUIREMENTS FOR**  
64 **ITS PROPOSED EVIP?**

65 A. No. RMP does not propose any plan for reporting to the PSC, neither on  
66 the performance of the plan nor the specific accounting of revenue  
67 collection from tariff Schedules 60 and 198 and associated capital  
68 investments and other spending.

69

70 **Q. IS IT TYPICAL FOR PROGRAMS OF REGULATED UTILITIES TO**  
71 **HAVE REPORTING REQUIREMENTS?**

72 A. Yes, it is typical for all ratepayer-funded programs of regulated utilities to  
73 have well established reporting requirements.

74

75 **Q. WHY ARE REPORTING REQUIREMENTS IMPORTANT?**

76 A. First and foremost, RMP must provide at least annual filings showing the  
77 complete accounting of the revenue collected through tariff Schedules 60  
78 and 198 as well as all expenses charged to the program. It is standard  
79 regulatory practice to have at least annual reporting for any tariff collecting  
80 revenues from customers to ensure that the accounting is being done  
81 correctly, including the proper application of a carrying charge. Reporting  
82 requirements are necessary to keep track of the full set of investments  
83 and expenses associated with the program, to understand the basic

84 elements of the program such as the total spending and total revenue  
85 collection, and to evaluate how much RMP is spending in each aspect of  
86 the program and how the balance is changing. In this case, it is  
87 particularly important to track this accounting because the enabling statute  
88 only authorizes a “maximum” of \$50 million of ratepayer funding.<sup>2</sup>

89 Reporting requirements are also important to ensure that the  
90 program is being implemented in a manner consistent with the public  
91 interest across time. Ten years is a long time for a single utility program to  
92 be approved, especially in the context of the quickly evolving electric  
93 vehicle (EV) and EV charging station markets. Periodic review is essential  
94 to ensure that the utility is making proper use of ratepayer funds and  
95 continuing to meet conditions required by statute and the PSC.

96 Finally, reporting requirements are necessary to demonstrate that  
97 individual expenditures made within the program are appropriate and  
98 prudent.

99

100 **Q. CAN THE PRUDENCY OF THE INVESTMENTS FUNDED BY EVIP BE**  
101 **EVALUATED SOLEY FROM RMP’S APPLICATION IN THIS DOCKET?**

102 A. No. While RMP witness James A. Campbell asserts the EVIP is prudent in  
103 his direct testimony<sup>3</sup>, I assert that prudence is unknowable at this time.

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<sup>2</sup> Utah Code § 54-4-41 (2)(a).

<sup>3</sup> 20-035-34, Direct Testimony of James A. Campbell, August 23, 2021, line 317.

104 While the PSC could approve the program based on the application and  
105 some modifications proposed by the OCS and likely other parties, the  
106 PSC cannot pre-approve the specific investments because RMP has only  
107 provided broad statements about the types of facilities it plans to include.  
108 It is clear from the application that the proposed EVIP is in the early  
109 planning stages and the actual infrastructure investments and locations of  
110 those investments are yet to be determined. Therefore, it is vital that clear  
111 and detailed reporting requirements are established now so that the  
112 prudence of investments under the proposed EVIP can be periodically  
113 evaluated over the life of the program.

114

115 **Q. ARE THERE OTHER UTILITY PROGRAMS THAT CAN PROVIDE AN**  
116 **EXAMPLE OF HOW TO ESTABLISH REPORTING REQUIREMENTS IN**  
117 **THIS DOCKET?**

118 A. Yes. RMP's Sustainable Transportation and Energy Plan (STEP) and  
119 Dominion Energy Utah's (DEU) Infrastructure Tracker Program (ITP) both  
120 include reporting requirements we can consider for the EVIP. For the  
121 STEP program, RMP is required to report annual budgets by project,  
122 annual spending by project, and annual revenues. These requirements  
123 would also be appropriate for accounting and annual reporting of the  
124 EVIP.

125 DEU has a more complicated ITP prudence review process that  
126 was recently reviewed and refined by key stakeholders and approved by

127 the PSC. DEU submits an annual filing of its ITP construction plan and  
128 budget followed by a technical conference. It then files quarterly budget  
129 variance reports, as well as at least annually an ITP tracker rate  
130 adjustment. The key stakeholders refined this prudence review process to  
131 make it more transparent and clarify reporting and actions to be taken  
132 before approval of final ITP rates. A modified version of this process would  
133 be appropriate for periodic review of the overall EVIP implementation and  
134 specific investments therein. I recommend that, in addition to the annual  
135 filings to the PSC of the EVIP accounting, RMP should be required to  
136 make periodic filings in which it presents its EVIP-related investment and  
137 construction plan, as well as report on the progress of general program  
138 implementation. The periodic filings should be accompanied with a  
139 technical conference and a comment period to facilitate input from  
140 interested stakeholders.

141

142 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS FOR REPORTING**  
143 **REQUIREMENTS TO BE APPLIED TO RMP'S EVIP PROGRAM?**

144 A. I recommend to the PSC that RMP be required to annually report the  
145 EVIP's annual budget, annual spending by investment, and annual  
146 revenues. I also recommend that the PSC require RMP to periodically  
147 make filings, establish a comment period, and hold technical conferences  
148 to update interested parties on the progress of the overall program's  
149 implementation and actual investments. This process should also facilitate



150 stakeholder input and prudence review of the specific investments made  
151 by RMP using this ratepayer funding source.

152

153 **SCHEDULE 2E: RESIDENTIAL SERVICE ELECTRIC VEHICLE TIME OF USE**

154 **PILOT PROGRAM**

155 **Q. HOW DO YOU RESPOND TO RMP'S PROPOSAL TO POSTPONE THE**  
156 **EXPIRATION OF THE SCHEDULE 2E PILOT PROGRAM FOR SIX**  
157 **MONTHS.**

158 A. I agree that there is benefit to waiting six months to determine the fate of  
159 the Schedule 2E pilot so that RMP has time to compile and report on the  
160 program's performance to the PSC and interested parties.

161

162 **Q. DOES THE UNCERTAINTY REGARDING SCHEDULE 2E PILOT**  
163 **CAUSE YOU CONCERN?**

164 A. Yes. Although I agree with the six-month continuation of Schedule 2E  
165 followed by an evaluation, I am concerned about the lost opportunity if  
166 there is not a continuation of Schedule 2E or a replacement time-of-use  
167 (TOU) rate associated with residential customer use of home electric  
168 vehicle chargers.

169

170 **Q. PLEASE EXPLAIN YOUR CONCERNS.**

171 A. I have concerns that as the EVIP expands vehicle charging infrastructure,  
172 new customers could increase system peaks, drive the need for costly

173 investments, and inadvertently harm non-participating customers if they do  
174 not understand the best hours in which to charge their vehicles to  
175 maximize the capacity of the existing grid and minimize any necessary  
176 additional investments to meet this new load. A TOU rate can reduce this  
177 need for additional investments. Because a TOU rate inherently has a  
178 customer education component, it incentivizes customers to select off-  
179 peak vehicle charging times via price signals. If the TOU rate expires,  
180 there would be neither education nor price signals for when it would be the  
181 best time to charge an electric vehicle.

182

183 **LACK OF EDUCATION ON HOW EV CHARGING IMPACTS THE SYSTEM**

184 **Q. DOES RMP PROPOSE ANY EDUCATIONAL COMPONENT AS PART**  
185 **OF ITS EVIP?**

186 A. No, not explicitly. The only aspect of RMP's proposed EVIP that could be  
187 interpreted as a minor educational component is the off-peak discount rate  
188 associated with its company-owned vehicle chargers. However, the EVIP  
189 application does not include any educational component for privately-  
190 owned vehicle chargers.

191

192 **Q. HAS RMP MADE ANY COMMITMENTS TO DEVELOP ELECTRIC**  
193 **VEHICLE CHARGING EDUCATION IN THE PAST?**

194 A. Yes. In its application to create its Plug-in Electric Vehicle (PEV) STEP  
195 program, RMP specifically indicated its intention to provide education to

196 participants on the system impacts of vehicle charging. The application  
197 stated, “This includes development of a website containing detailed  
198 information about the PEV Program and tools for customers to better  
199 understand impacts on the grid and appropriate charging behavior.”<sup>4</sup>  
200 Subsequently, in its Supplemental Application to Implement Electric  
201 Vehicle Incentive and Time of use Pricing Programs, RMP committed “to  
202 allocate a portion of the Program budget annually to outreach and  
203 awareness for EVs.”<sup>5</sup> Although this commitment was less specific about  
204 appropriate charging behavior it did specifically include a reference to PEV  
205 cost and benefits. Certainly, the impacts of different charging behavior  
206 should be included in any discussion or outreach addressing PEV cost  
207 and benefits.

208

209 **Q. DID RMP FOLLOW THROUGH ON ITS COMMITMENT TO BUILD A**  
210 **WEBSITE THAT INCLUDES EDUCATION ON APPROPRIATE**  
211 **VEHICLE CHARGING BEHAVIOR?**

212 A. No. While RMP did build a webpage titled “Charging your electric vehicle”,  
213 it only contains information on the charging infrastructure a customer may  
214 need. The webpage does not include information to educate customers on

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<sup>4</sup> Docket No. 16-035-36, STEP Application, p. 10, September 12, 2016.

<sup>5</sup> Docket No. 16-035-36, Supplemental Application, paragraph 8, bullet 2, January 31, 2017.

215 appropriate charging behaviors such as off-peak charging.<sup>6</sup> I have  
216 attached a copy of this webpage to my testimony as OCS Exhibit 1D.

217 I acknowledge that the majority of the electric vehicle portion of the  
218 STEP docket, referred to as Phase 3, focused on disputes over the time-  
219 of-use rate pilot. Also, the settlement covering other portions of Phase 3  
220 did not specifically address consumer education. In my opinion, this is an  
221 additional reason why the PSC should require an educational component  
222 now in this docket. It appears that absent a specific requirement, RMP will  
223 not view such education as a priority element of the EVIP program.  
224

225 **Q. WHY IS AN EDUCATIONAL COMPONENT IMPORTANT TO THIS**  
226 **EVIP?**

227 A. The EVIP is about more than just company-owned commercial vehicle  
228 charging stations. RMP is also requesting to continue financial incentives  
229 for privately-owned vehicle chargers under tariff Schedule 120 for the  
230 duration of the 10-year EVIP – as discussed more in the next section. As  
231 the adoption of privately-owned vehicle chargers increases, it is vital that  
232 customers are aware of the impacts to the grid when vehicles are charged  
233 during peak hours. Encouraging appropriate charging behavior is essential  
234 to minimize system peaks and avoid the need for costly grid upgrades.

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<sup>6</sup> <https://www.rockymountainpower.net/savings-energy-choices/electric-vehicles/charging-your-ev.html>

235

236 **Q. WHAT IS YOUR RECOMMENDATION REGARDING EV CHARGING**  
237 **EDUCATION?**

238 A. I recommend that the PSC should require RMP to include a robust vehicle  
239 charging education program for customers as part of the overall EVIP.

240 Such a program should include an explanation of how different charging  
241 behaviors, such as on and off-peak charging, impact the grid. This  
242 explanation should include recommendations for best charging times and  
243 explain how certain patterns of charging behavior could drive the need for  
244 additional electric system investments, raising rates and harming all  
245 customers, especially non-participating customers.

246 I further recommend that RMP be required to work with key  
247 stakeholders to evaluate if there is a need for additional education  
248 components to help ensure that the EVIP is a success.

249 Lastly, in the next section, I also recommend changes to tariff  
250 schedule 120 that are partially tied to the implementation of a vehicle  
251 charging education program.

252

253 **SCHEDULE 120: PLUG-IN ELECTRIC VEHICLE INCENTIVE PILOT**

254 **PROGRAM**

255 **Q. WHAT DOES RMP PROPOSE IN THIS DOCKET FOR THE SCHEDULE**  
256 **120 PILOT PROGRAM?**

257 A. In his direct testimony, RMP witness Robert Meredith recommends that  
258 Schedule 120 vehicle charger incentives be extended for the duration of  
259 the proposed 10-year EVIP.

260

261 **Q. DO YOU HAVE CONCERNS WITH MR. MEREDITH'S PROPOSAL?**

262 A. Yes. I am concerned about a blanket extension of Schedule 120 for ten  
263 years, the entire length of the EVIP. I am also specifically concerned about  
264 the inclusion of incentives for residential Level 2 chargers in the current  
265 context of the phase-out of Schedule 2E and the lack of an educational  
266 component to the EVIP.

267

268 **Q. WHY IS A TEN-YEAR EXTENSION PROBLEMATIC?**

269 A. In my opinion, a ten-year extension of Schedule 120 is problematic for  
270 several reasons. The electric vehicle market is evolving quickly so I  
271 question the reasonableness of extending pilot program incentives for ten  
272 years without a review to assess if the incentives are at the correct levels  
273 for the existing market. The cost of level 2 chargers has been coming  
274 down and we should have a better understanding of whether additional  
275 price drops are expected. It is important to set appropriate incentives so  
276 that we avoid free ridership as much as possible. Also, while I understand  
277 that tariffs can be adjusted over time, I believe setting the expiration of  
278 Schedule 120 so far into the future may set expectations with participants  
279 that makes reducing or eliminating incentives more difficult later.

280

281 **Q. WHAT IS YOUR PROPOSED SOLUTION?**

282 A. I recommend that Schedule 120 receive a much shorter extension. In my  
283 opinion, it is reasonable to extend these incentives for only two or three  
284 years, after which the program should be reevaluated. If the incentives still  
285 make sense at that time, Schedule 120 could always be extended again if  
286 RMP specifically demonstrates that it is the best use of EVIP funds and in  
287 the public interest. It is less disruptive to participants to extend a program  
288 than to end it early.

289

290 **Q. WHAT IS YOUR RECOMMENDATION REGARDING THE**  
291 **RESIDENTIAL COMPONENT OF THE INCENTIVES INCLUDED IN**  
292 **SCHEDULE 120?**

293 A. Without an educational component as previously discussed, it is not in the  
294 public interest to continue using ratepayer funds on residential incentives  
295 under Schedule 120. These incentives, by increasing the number of  
296 residential EV chargers, could impact system peaks and lead to additional  
297 costs for all customers, especially non-participating customers. The  
298 residential incentives should be removed from Schedule 120 at this time.  
299 The PSC should require a specific demonstration that residential  
300 incentives are in the public interest prior to including them in Schedule  
301 120. Such a demonstration should include at least a basic education  
302 program for customers who privately-own vehicle chargers, explaining the

303 preferred hours for charging and the potential impacts to the electric  
304 system of charging during peak hours.

305 However, I note that it isn't clear that the residential incentives  
306 would be in the public interest and the best use of the EVIP funds even if  
307 an education program is in place. A future filing should evaluate all  
308 aspects of the public interest and I recommend that the PSC consider an  
309 education program as a necessary but not sufficient condition for  
310 approval.

311

312 **NEW SCHEDULE 60 EVIP TARIFF**

313 **Q. PLEASE DESCRIBE NEW TARIFF SCHEDULE 60 THAT RMP IS**  
314 **PROPOSING IN THIS DOCKET.**

315 A. Schedule 60, titled "Company Operated Electric Vehicle Charging Station  
316 Service", is the newly proposed tariff that explains the electric usage rates,  
317 time periods, and special conditions proposed by RMP to govern its  
318 Company-owned EV charging stations.

319

320 **Q. DO YOU HAVE ANY CONCERNS WITH THE LANGUAGE OF**  
321 **SCHEDULE 60 AS PROPOSED?**

322 A. Yes I do. I will address specific concerns with these three proposed  
323 special conditions:

324



- 325 1. Special Condition #1 states that RMP may impose a penalty on  
326 customers who do not make their charging station available to  
327 others after session completion.
- 328 2. Special Condition #5 indicates that RMP intends to increase the  
329 prices in Schedule 60 annually by the same percentage as base  
330 retail rate increases.
- 331 3. Special Condition #6 indicates that RMP may, at its discretion, file  
332 additional rate changes if the need arises.

333

334 **Q. PLEASE EXPLAIN YOUR CONCERN WITH SPECIAL CONDITION #1.**

335 A. My concern with Special Condition #1 is the specific language proposed  
336 by RMP and the fact that it does not comport with standard requirements  
337 for tariff conditions. RMP's currently proposed language is as follows:

338

- 339 1. The Company may impose a penalty on any individual who,  
340 upon session completion, does not make their station available  
341 to others.

342

343 While I generally agree with the sentiment of the condition, RMP has not  
344 detailed what the penalty is and how it would be applied. Also, RMP does  
345 not have the authority to institute such a penalty without review and  
346 approval by the PSC. Therefore, I propose this alternate language for  
347 Special Condition 1: "Customers are expected to make a charging station

348 available immediately following session completion. If cause arises, the  
349 Company may seek approval from the Commission to institute a penalty  
350 policy.”

351

352 In the alternative, RMP could propose specific terms and conditions for a  
353 proposed penalty in its rebuttal testimony. Such a proposal should include  
354 specific penalty rates, terms and conditions, and supporting evidence of its  
355 proposal. RMP would need to include clear and compelling evidence  
356 supporting whatever it proposed, providing adequate details of its  
357 proposed penalty policy to facilitate review during the remainder of this  
358 docket.

359

360 **Q. PLEASE EXPLAIN YOUR CONCERN WITH SPECIAL CONDITION #5.**

361 A. I have both stylistic and substantive concerns with this condition. RMP  
362 proposes the following language in Special Condition #5:

363

364 5. For the first five years of the Electric Vehicle Incentive Program,  
365 prices listed on this tariff shall change by the same percentage  
366 as base retail price changes rounded to the nearest cent.

367

368 My primary concern about the language in Special Condition #5 is that  
369 EVIP rates should adjust by the same percentage as other rate classes  
370 considering all rate elements, not just base rates. It is particularly

371 important for annual EVIP rate changes to also include the annual  
372 changes passed through the Energy Balancing Account (EBA). If in any  
373 year the EBA has a large increase due to an increase in power costs,  
374 RMP's base rates approach would not pass any of such an increase to  
375 Schedule 60 customers. While I acknowledge that Schedule 60 will not  
376 initially be a cost-based rate, RMP's proposal appears designed to ensure  
377 that Schedule 60 rates basically keep pace with changes affecting other  
378 rate schedules. I support that approach. Therefore, annual changes to  
379 EVIP rates should be based on the percentage all rates have changed,  
380 not just base rates, which typically change much less frequently and may  
381 not capture significant changes in energy costs.

382 Second, I am concerned that the tariff language indicates these  
383 changes "shall" take place, despite the caveat listed in special condition  
384 #6 and the fact that other factors could arise to influence the actual,  
385 annual rate changes. A tariff is meant to give current, not future, rates.  
386 While it is appropriate to describe the likely trajectory of rates, it would be  
387 inappropriate to use the word "shall" in describing these future changes.

388 To remedy these two problems, I recommend that Special  
389 Condition #5 be rewritten such that it reads: "For the first five years of the  
390 Electric Vehicle Incentive Program, the Company intends to request to  
391 change prices listed on this tariff by the same percentage as retail price  
392 changes rounded to the nearest cent."

393

394 **Q. PLEASE EXPLAIN YOUR CONCERN WITH SPECIAL CONDITION #6.**

395 A. My concern with Special Condition #6 relates to language that could be  
396 misleading. RMP proposes the following language:

397

398 6. The Company may at its discretion file with the Commission to  
399 change rates on this schedule as the need arises.

400

401 It is important that the language of this condition accurately reflects that  
402 the PSC would need to agree and approve any proposed change in rates.

403 I recommend the language be rewritten as: "The Company may at its

404 discretion file a request with the Commission to change rates on this

405 schedule as the need arises."

406

407 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS FOR SCHEDULE**  
408 **60.**

409 A. My recommendations are as follows:

410 1. To remedy the tariff language giving RMP inappropriate authorization to

411 charge undefined penalties, I propose Special Condition #1 to be rewritten

412 as: "Customers are expected to make a charging station available

413 immediately following session completion. If cause arises, the Company

414 may seek approval from the Commission to institute a penalty policy."

415

416 In the alternative, RMP could propose (in its rebuttal testimony) specific  
417 rates, terms and conditions for penalties, along with evidence supporting  
418 its proposal, to be addressed within this docket.

419

420 2. To remedy the potentially misleading language and potentially skewed  
421 annual rate increases, I recommend that the words “shall” and “base” be  
422 deleted from Special Condition #5 along with minor additional changes as  
423 described above.

424

425 3. To better represent the actual process for tariff changes, I recommend  
426 that the words “a request” be inserted in Special Condition #6.

427

428 I have attached a redline version to RMP’s proposed tariff Schedule 60 as  
429 OCS Exhibit 2D that includes these recommendations.

430

431 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE PSC.**

432 A. I recommend that the PSC require RMP to make the following changes to  
433 its EVIP prior to approving its proposal.

434

435 1. I recommend that RMP be required to annually report the EVIP’s  
436 annual budget, annual spending by investment, and annual  
437 revenues. I also recommend that RMP be required to periodically  
438 make filings, establish a comment period, and hold technical

439 conferences to update interested parties on the overall program's  
440 implementation and actual investments. This process should also  
441 facilitate stakeholder input and prudence review of the specific  
442 investments made by RMP using this ratepayer funding source.

443

444 2. I recommend that RMP be required to include a robust vehicle  
445 charging education program for customers as part of the overall  
446 EVIP. Such a program should include an explanation of how  
447 different charging behaviors, such as on and off-peak charging,  
448 impact the grid. This explanation should include recommendations  
449 for best charging times and explain how certain patterns of  
450 charging behavior could drive the need for additional electric  
451 system investments, raising rates and harming non-participating  
452 customers. I further recommend that RMP be required to work with  
453 key stakeholders to evaluate if there is a need for additional  
454 education components to help ensure that the EVIP is a success.

455

456 3. I recommend that tariff Schedule 120 be extended for only two or  
457 three years and be subject to reevaluation following that extension.

458

459 4. I recommend that the residential incentive be eliminated from tariff  
460 Schedule 120 at this time. Following the implementation of a  
461 vehicle charging education program as part of the EVIP, a future

462 filing should reevaluate if reinstating this residential incentive is in  
463 the public interest.

464

465 5. I recommend that Special Condition #1 in draft tariff Schedule 60  
466 should be reworded to: "Customers are expected to make a  
467 charging station available immediately following session  
468 completion. If cause arises, the Company may seek approval from  
469 the Commission to institute a penalty policy."

470

471 In the alternative, RMP could propose (in its rebuttal testimony)  
472 specific rates, terms and conditions for penalties, along with  
473 evidence supporting its proposal to be evaluated in the remainder  
474 of this present docket.

475

476 6. I recommend that Special Condition #5 in draft tariff Schedule 60  
477 should be reworded to: "For the first five years of the Electric  
478 Vehicle Incentive Program, the Company intends to change prices  
479 listed on this tariff by the same percentage as retail price changes  
480 rounded to the nearest cent."

481

482 7. I recommend that Special Condition #6 in draft tariff Schedule 60  
483 should be reworded to: "The Company may at its discretion file a

484 request with the Commission to change rates on this schedule as  
485 the need arises.”

486

487 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

488 **A. Yes.**