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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Electrical Vehicle Infrastructure Program	Docket No. 20-035-34
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PREFILED SURREBUTTAL TESTIMONY OF

DEBORAH KAPILOFF

ON BEHALF OF

WESTERN RESOURCE ADVOCATES

November 17, 2021

1 **Q: Please state your name, employer, position, and business address.**

2 A: My name is Deborah Kapiloff. I am employed by Western Resource Advocates (“WRA”)
3 in its Clean Energy Program as a Transportation Electrification Policy Analyst. My
4 business address is 2260 Baseline Rd Suite 200, Boulder, CO 80302.

5 **Q: Are you the same Deborah Kapiloff who provided direct and rebuttal testimony on**
6 **behalf of Western Resource Advocates?**

7 A: Yes, I am.

8 **Q: What is the purpose of your surrebuttal testimony?**

9 A: The purpose of this surrebuttal testimony is to address claims made by other parties in
10 rebuttal testimony. Specifically, I will address claims made related to WRA’s proposed
11 Company-owned charging station siting criteria, residential rebates, and the glidepath to
12 cost-of-service rates at Company-owned charging stations.

13 **Q: What is your response to Mr. Campbell’s claim that WRA’s proposed**
14 **recommendation on primary and secondary siting criteria for Company-owned**
15 **charging stations does not enhance the Program’s ability to meet statutory public**
16 **interest and prudence requirements?**

17 A: Mr. Campbell asserts that WRA’s recommendation to institute primary and secondary
18 siting criteria for Company-owned charging stations does not “enhance the Program’s
19 ability to meet statutory requirements for public interest and prudence” and, specifically,
20 that the recommendation would not “increase EV adoption or increase revenue compared

21 to the locations already identified by the Company.”¹ My proposed primary and
22 secondary siting criteria recommendation prioritizes building Company-owned charging
23 stations in areas unlikely to be provisioned by the private market and which are especially
24 in need of infrastructure deployment. My suggested primary criteria of filling corridor
25 gaps, building in areas with no high-powered charging infrastructure present, and in areas
26 in which owner-occupied housing is below the state average, prioritize siting
27 infrastructure in a manner which addresses barriers to EV adoption. I address why
28 prioritizing these criteria is important to increasing EV adoption below.

29 **Q: Why does your recommendation about primary and secondary siting criteria for**
30 **Company-owned charging stations enhance EVIP’s ability to increase EV**
31 **adoption?**

32 A: In my direct testimony I explained why the three criteria I designate as primary are
33 especially important to increasing EV adoption and improving the Program’s ability to
34 increase EV adoption². I will briefly reiterate my argument here. Siting charging
35 infrastructure in corridor gaps and areas with no high-powered charging inherently
36 increases the charging availability in the state, allowing for greater ease of charging and
37 opening up additional travel routes for EV drivers. Considering range anxiety is one of
38 the primary reasons drivers cite for not purchasing an EV, filling corridor gaps and
39 adding chargers in areas where no high-powered charging infrastructure exists is a key
40 strategy to increasing EV adoption. There is a direct, positive link between the prevalence
41 of charging infrastructure and a consumer’s willingness to consider purchasing an EV.

¹ Campbell Rebuttal Testimony, lines 297-302.

² Kapiloff Direct Testimony, lines 485-506.

42 Furthermore, for consumers who do not have charging access at home, access to public
43 charging is a crucial variable in the EV adoption equation. As such, my recommended
44 primary criteria would increase the Program's ability to foster greater EV adoption.

45 Additionally, Mr. Campbell's proposed metric of increased revenues at Company-owned
46 charging stations does not, by itself, necessarily represent effective siting. Company-
47 owned charging stations generating large amounts of revenue are likely sited in high-
48 use, lucrative locations. Considering the prime locations needed to generate increased
49 revenues, utility-owned (and ratepayer-funded) infrastructure may be less needed in these
50 locations, because it could have been provisioned by the private market. Deploying
51 utility-owned infrastructure that could have been otherwise provisioned by other
52 entities is not an especially efficient use of funding. I disagree with Mr. Campbell's claim
53 that my proposed siting criteria do not enhance the Program's ability to meet statutory
54 public interest and prudence requirements. I chose them specifically to address barriers to
55 EV adoption and reaffirm that my proposed siting criteria would enhance the Program.

56 **Q: Do you have further comments on Mr. Ware's proposal to remove residential**
57 **rebates from Schedule 120?**

58 A: Yes. Mr. Ware asserts that without a time-of-use rate, residential rebates should be
59 removed from Schedule 120. Removing residential rebates because there is not yet
60 a time-of-use rate in place removes a crucial element of the Schedule 120
61 incentives. Since the majority of EV charging occurs at home, the residential rebate
62 portion of Schedule 120 addresses a key portion of the charging market, as well as offers
63 the Company an opportunity to provide education directly to the customer. In rebuttal

64 testimony the Company agrees to provide education and outreach, including “an
65 explanation of how different charging behaviors, such as on and off-peak charging,
66 impact the grid[,] . . . recommendations for best charging times[,] . . . and how certain
67 patterns of charging behavior could drive the need for additional electric system
68 investments, raising rates and harming all customers, including non-
69 participating customers.”³ Given the customer education and outreach the Company will
70 conduct, the residential rebates should not be removed as there will be efforts made to
71 encourage responsible charging behaviors. Furthermore, WRA is supportive of
72 requiring a time-of-use rate for residential rebates should a permanent residential time-of-
73 use be established.

74 **Q: What is your opinion of Mr. Meredith’s response to WRA’s recommendation of an**
75 **eight-year glidepath to cost-of-service rates at Company-owned charging stations?**

76 A: Mr. Meredith expresses concern that an eight-year glidepath to cost-of-service rates based
77 off data from the cost-of-service study conducted in the program’s first year would be
78 reliant on inadequate data. I accept the basis of Mr. Meredith’s reasoning; however, I
79 cannot make a judgment on the adequacy of the data when the cost-of-service study has
80 not yet been conducted. Mr. Meredith may be correct that basing the glidepath on the first
81 cost-of-service is not a wise decision, and this issue should be addressed when the cost-
82 of-service study is conducted and the data is available. Should the data not be adequate,
83 perhaps because very few charging stations have been constructed and are in operation, it

³ Campbell Rebuttal Testimony, lines 354-360.

84 may be appropriate to delay the glidepath by a year. However, I do not support pre-
85 emptively making this determination now.

86 **Q: Does this conclude your surrebuttal testimony?**

87 **A: Yes.**