



April 15, 2022

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

RE: Docket No. 20-035-34

Application of Rocky Mountain Power for Approval of Electrical Vehicle Infrastructure Program

Comments of Western Resource Advocates on RMP's Proposed Report

On March 21, 2021, PacifiCorp (dba Rocky Mountain Power or RMP) filed a Proposed Report template outlining annual reporting on the Electric Vehicle Infrastructure Program (EVIP). Western Resource Advocates (WRA) has reviewed RMP's Proposed Report and, consistent with the Commission's March 23, 2022, *Notice of Filing and Comment Period*, provides these comments and recommendations. WRA appreciates the opportunity to provide input.

In its Proposed Report, RMP recommends that annual EVIP reports be filed on or around April 1 of each year for the duration of EVIP, beginning in 2023 for calendar year 2022. RMP's Proposed Report consists of two Attachments: Attachment A will provide a table of accounting details, while Attachment B will provide written updates for each of the four components of EVIP (Company-Owned Charging Stations, Make-Ready Infrastructure, Partnerships, and Educational Outreach/Marketing.) RMP anticipates that the EVIP annual report will be modified and enhanced as the program progresses.

WRA generally supports RMP's Proposed Report and the notion that the report can evolve as the program progresses. WRA offers the following specific recommendations related to both Attachment A (accounting details) and Attachment B (written updates on program components).

Attachment A. Within Attachment A, containing monthly information on program revenues and spending, WRA recommends RMP also provide information on spending related to the Partnerships component of the EVIP, in addition to the other program components.

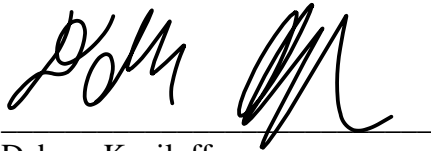
Attachment B, Section 1a – Company-Owned Charging Stations. Under “Utilization Evaluation,” WRA recommends that RMP provide a table containing the following information for each company-owned charging station: load factor, percentage of RMP vs. non-RMP customer charging sessions, monthly on- and off-peak utilization, and revenue. WRA believes this recommendation is consistent with what RMP proposed (with some additional specificity), but

suggests that the information be provided in table format in addition to (or instead of) a chart or graph.

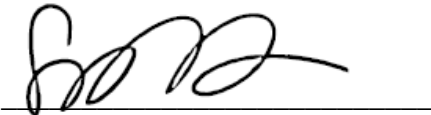
Attachment B, Section 1c – Partnerships. WRA recommends that, in addition to written updates, RMP also include documentation of partnership efforts, such as memoranda of understanding (MOUs), contracts, project scoping documents, or other partnership-specific reporting related to the Inland Port Authority, Mountain States Land, Utah Department of Transportation, or other potential partnerships.

Attachment B, Section 1d – Educational Outreach/Marketing. To better understand RMP’s efforts on educational outreach and marketing, which may inform EVIP reviews over time, WRA recommends RMP include copies of customer-facing communications, links to relevant public-facing websites, and summaries of customer feedback as an addendum to the written update.

Sincerely,



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Western Resource Advocates



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Western Resource Advocates