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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director
Alex Ware, Utility Analyst

Date: April 20, 2022

Subject: Docket 20-035-34

IN THE MATTER OF: Application of Rocky Mountain Power for Approval of Electric Vehicle Infrastructure Program.

INTRODUCTION

On March 21, 2022, Rocky Mountain Power (RMP) filed its proposed reporting format for the recently approved Electric Vehicle Infrastructure Program (EVIP) with the Public Service Commission (PSC). On March 23, 2022, the PSC issued a Notice of Filing and Comment Period establishing that interested parties may submit comments regarding the proposed changes on or before April 20, 2022 and reply comments on or before May 5, 2022. The Office of Consumer Services (OCS) provides the following comments pursuant to that schedule.

BACKGROUND

On December 20, 2021, the PSC approved the Settlement Stipulation that sets the terms of the creation of the EVIP. Specifically relevant to these comments, the stipulation designates that within 90 days of the PSC's order, RMP will file a proposed reporting template and that interested parties will have the opportunity to provide feedback through comments.¹

¹ 20-035-34 Settlement Stipulation, paragraph 39, 11-17-2021.

RMP'S PROPOSED EVIP REPORTING FORMAT

RMP states that it reviewed the direct testimony submitted in this docket as a starting point for what should be included in EVIP reporting requirements. In what it calls **Attachment A**, RMP proposes to report on the accounting of:

- Revenues from Schedule 198
- Revenues from Schedule 60
- Program expenses, by type and program component
- Capital expenditure
- Carrying Charge

Also, RMP explains that what it calls **Attachment B** will contain a written status update, divided into sections for each component of the EVIP:

- Company-owned Charging Stations – status and utilization evaluation
- Make Ready Infrastructure – status, application count, dollars of request, funding status, location, station, and equipment information
- Partnerships – efforts collaborating with the Inland Port Authority, Mountain States Land, and the Utah Department of Transportation
- Educational Outreach & Marketing – efforts by project and customer feedback

OCS ANALYSIS

Establishing reporting and educational outreach requirements for the EVIP program is an important element of the settlement for the OCS. We appreciate the efforts of all stakeholders in informal discussions over the past few months to brainstorm EVIP reporting requirements. The OCS supports the proposed requirements and agrees with RMP's assessment that these requirements may need to be revised over time as data becomes available following EVIP implementation. The OCS looks forward to the opportunity to review the EVIP annually.

RECOMMENDATION

The OCS recommends that the PSC approve RMP's proposed reporting requirements for the EVIP.

cc:

Jana Saba, Rocky Mountain Power
Chris Parker, Division of Public Utilities