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UTAH DEPARTMENT OF COMMERCE

Division of Public Utilities

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Comments

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

Date: April 20, 2022

Re: **Docket No. 20-035-34**, Application of Rocky Mountain Power for Approval of its Electric Vehicle Infrastructure Program *Proposed Reporting Template*

Recommendation (Approval with Recommendations)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) approve Rocky Mountain Power's (RMP) Electric Vehicle Infrastructure Program (EVIP) Reporting Template proposal (Proposal) as a work in progress and conditioned on the Division's recommendations stated herein.

Issue

On March 23, 2022, the Commission issued its Notice of Filing and Comment Period for RMP's EVIP Proposal submitted to the Commission on March 21, 2022. The Commission asked that any person interested in filing comments and reply comments do so by April 20, 2022, and May 5, 2022, respectively.

Background

The Utah Legislature passed House Bill 396, Electric Vehicle Charging Infrastructure Amendments, during the 2020 legislative session. HB 396 was codified in section 54-4-41

Division of Public Utilities

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of the Utah Code authorizing RMP to create its EVIP program. Section 54-4-41(8) requires RMP to submit an annual report of the EVIP's activities for the previous calendar year to the Legislature's Public Utilities, Energy, and Technology Interim Committee (PUETIC) by June 1st of each year.

RMP filed its proposed EVIP program with the Commission on August 23, 2021. In accordance with the Commission's scheduling order,¹ interested parties filed direct testimony on October 19, 2021, with various recommendations for the EVIP. Notably, all parties who filed testimony expressed interest in and offered suggestions regarding additional reporting of the EVIP program beyond the required reporting to the PUETIC. Paragraph 39 of the Settlement Stipulation addresses the reporting requirements of the EVIP and requires RMP to submit annual reports to the Commission for the duration of the EVIP.

Discussion

RMP's Proposal is based on the annual Sustainable Transportation and Energy Plan (STEP) reports and similarly is a work in progress that may be modified and enhanced accordingly as the EVIP program progresses. The Division has reviewed the accounting information outlined in Attachment A of the Proposal and concludes that the report adequately addresses the accounting information needed to evaluate the prudence requirement of the program. The Division recommends that RMP be reminded that all support materials included in the filing, like spreadsheets for example, contain intact formulae, links, and references to the origin of all values and content.

Attachment B of the Proposal contains additional information requested during the stipulation discussions. Like the STEP reports, Attachment B will contain a written status update, divided into sections for each component of the EVIP.² The Division concludes that the components contained in Attachment B are reasonable. However, the Division recommends that RMP also include a category in Attachment B that demonstrates charger uptime and downtime,

¹ See Commission Scheduling Order and Notice of Hearing, Docket No. 20-035-34, September 14, 2021, <https://pscdocs.utah.gov/electric/20docs/2003534/3202722003534soanoh9-14-2021.pdf>.

² See Rocky Mountain Power's RMP Proposed Report, Docket No. 20-035-34, March 21, 2022, page 2, <https://pscdocs.utah.gov/electric/20docs/2003534/323087RMPPrpsdRprt3-21-2022.pdf>.

including the reason for the downtime and time to repair. This reliability category should at least report on RMP's own chargers and third-party chargers if possible.

RMP recommends that it file the EVIP with the Commission on or around April 1st of each year for the previous calendar year beginning on April 1, 2023. The Division supports RMP's proposed report filing date.

Conclusion

The Division has reviewed RMP's Proposal and concludes that it adequately addresses, with the Division's additional recommendations stated above, the reporting requirements determined during the settlement discussions between the parties. The Division understands that like the STEP program reporting, the EVIP reporting will be a work in progress with possible modifications and enhancements as the program progresses. Therefore, with the recommendation to add reliability metrics to Attachment B, the Division recommends the Commission approve RMP's EVIP reporting template and filing of its first report on or before April 1st of 2023.

cc: Jana Saba, RMP
Michele Beck, OCS