

May 5, 2022

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

Re: Docket No. 20-035-34
Application of Rocky Mountain Power for Approval of Electric Vehicle
Infrastructure Program
RMP Reply Comments: EVIP Proposed Report

On March 21, 2022, PacifiCorp d. b. a Rocky Mountain Power (“RMP” or “the Company”) submitted its proposed report (“Proposed Report”) on the Electric Vehicle Infrastructure Program (“EVIP”) to the Public Service Commission of Utah (“Commission”). This Proposed Report is submitted in accordance with the Settlement Stipulation filed in the above referenced proceeding on November 17, 2021, which was approved by the Commission on December 20, 2021 (“EVIP Stipulation”). Per the Commission’s Notice of Filing and Comment Period issued March 23, 2022, the Division of Public Utilities (“Division”), Office of Consumer Services (“Office”) and Western Resource Advocates (“WRA”) filed comments with various recommended changes to the Proposed Report. The Company hereby submits these reply comments in response to the recommendations

Summary of Recommended Changes

The Division recommends the Company include information in Attachment B that provides charger uptime and downtime for Company owned chargers (and third-party chargers, if possible) along with reasons for the downtime and time for repair. The Company agrees to provide this information.

The Office did not propose any changes to the Proposed Report at this time; however, they note that as they conduct their annual reviews they will reassess and may recommend changes as needed. The Company reiterates its commitment to working with parties to develop an EVIP report that is informative and useful.

WRA proposes changes to both Attachment A and Attachment B as follows:

Attachment A. WRA recommends RMP also provide information on spending related to the Partnerships component of the EVIP, in addition to the other program components. The Company agrees to provide this information.

Attachment B, Section 1a – Company-Owned Charging Stations. Under “Utilization Evaluation,” WRA recommends that RMP provide the following information in table format 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.

The Company agrees to present this information in a table format as recommended by WRA.

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, 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.

The Company does not support providing additional information beyond the written updates. WRA is proposing that the Company provide contracts, project scoping documents of Inland Port Authority, Mountain States Land and Utah Department of Transportation. Revealing the proposed information from proposed organizations, who are customers of the Company, is inappropriate and would contain confidential customer information.


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. The Company agrees to provide this information.

RMP Recommendation

The Company recommends the Commission establish the Proposed Report as modified in these reply comments as the template for the annual EVIP Report. The Company recommends the annual EVIP Report be due on or around April 1 of each year for the duration of the EVIP, which will report on the EVIP activities for the previous calendar year. The first report would be due April 1, 2023, containing calendar year 2022 information.

Informal inquiries may be directed to Jana Saba, Manager, State Regulatory Affairs, at (801) 220-2823.

Sincerely,



Joelle Steward

Senior Vice President, Regulation and Customer & Community Solutions

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Enclosures

CC: Service List - Docket No. 20-035-34

CERTIFICATE OF SERVICE

Docket No. 20-035-34

I hereby certify that on May 5, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

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