

July 25, 2025

VIA ELECTRONIC FILING

Utah Public Service Commission
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 – In the Matter of the Application of Rocky Mountain Power’s Application for Approval of Electric Vehicle Infrastructure Program**
Program Review

Rocky Mountain Power (“RMP”) hereby submits for filing its Application and supporting testimony for approval to modify the Electric Vehicle Infrastructure Program (“EVIP”) as part of the program review required by the approved Settlement Stipulation establishing the program pursuant to Utah Code 54-4-41.

RMP’s request is supported by the pre-filed, direct testimonies of witnesses James A. Campbell and Kenneth Lee Elder, Jr. Mr. Campbell’s testimony includes six exhibits, three of which are confidential. Mr Elder’s testimony includes five exhibits, which do not contain confidential information.

The Confidential information, including detailed estimates of expected EVIP expenditures, has been uploaded to the Public Service Commission of Utah’s (“Commission”) SFTP site. In accordance with the Order Granting Motion for Protective Order in this proceeding issued September 27, 2021 (“Protective Order”), confidential information will be disclosed to the Division of Public Utilities (“DPU”), the Office of Consumer Services (“OCS”), along with associated counsel and consultants, if applicable. In accordance with the Protective Order and Utah Admin. Code R746-1-602(1)(b)(i), representatives for Western Resource Advocates (“WRA”) and Utah Clean Energy (“UCE”) who have previously filed the non-disclosure agreement (“NDA”) in this proceeding as described in the Protective Order will also be provided confidential information. Other parties who wish to receive confidential information should contact Joe Dallas, Senior Attorney, at joe.dallas@pacificorp.com.

Informal inquiries may be directed to Max Backlund at (801) 220-3121.

Public Service Commission of Utah

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Sincerely,

A handwritten signature in cursive script, appearing to read "Jana Saba".

Jana Saba

Director, Regulatory Affairs

Enclosures

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

Joe Dallas
Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84116
Email: joseph.dallas@pacifiCorp.com

Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| 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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**APPLICATION FOR APPROVAL OF AMENDMENTS TO THE ELECTRIC VEHICLE
INFRASTRUCTURE PROGRAM AND TARIFF REVISIONS**

PacifiCorp, dba Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), hereby submits this Application (“Application”) to the Public Service Commission of Utah (“Commission”), to make certain changes to Electric Vehicle Incentive Program (“EVIP”) and associated tariffs proposed herein. The proposed revisions to the EVIP meet the requirements of Utah Code 54-4-41 as described by the Company, and are consistent with paragraph 41 of the Settlement Stipulation (“Stipulation”) approved by the Commission in the current docket on December 20, 2021.

In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, that provides electric service to retail customers in the states of Utah, Wyoming, and Idaho. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission’s

jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately 948,000 customers in Utah. Rocky Mountain Power's principal place of business in Utah is 1407 West North Temple, Suite 320, Salt Lake City, Utah 84116.

2. Communications regarding this Application should be sent to:

Max Backlund
Utah Regulatory Affairs Manager
Rocky Mountain Power
1407 West North Temple, Suite 310
Salt Lake City, UT 84116
Email: max.backlund@pacificorp.com

Joe Dallas
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
E-mail: joseph.dallas@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be submitted to datarequest@pacificorp.com. Informal inquiries related to this Application may be directed to Max Backlund, Utah Regulatory Affairs Manager, at (801) 220-3121.

BACKGROUND

3. On December 20, 2021, the Commission approved a Settlement Stipulation (Stipulation") establishing the EVIP pursuant to Utah Code 54-4-41.¹ The EVIP is a ten-year program that allows for \$50 million in funding for costs associated with the deployment of electric vehicle charging infrastructure. Paragraph 41 of the Stipulation requires the Company to file for a program review after the program has been in effect for three years ("Program Review"). The Stipulation specifies that during the Program Review, there will be an opportunity to evaluate the prudence of investments being made; recommend changes to Electric Service Schedules 60, 120,

¹ *In the Matter of the Application of Rocky Mountain Power for Approval of Electric Vehicle Infrastructure Program*, Docket No. 20-035-34, Settlement Stipulation (Nov. 17, 2021) (subsequently approved by Commission on Dec. 20, 2021).

and 198, including a plan to transition Schedule 60 to full cost of service; and adjust the percentages of expenditures allocated to Company-owned chargers (45 percent), make-ready investments (45 percent), and innovative projects and partnerships (10 percent).

PREFILED TESTIMONY

1. In support of this Application, the Company submits the testimony and exhibits of James A. Campbell. Mr. Campbell's testimony: (1) provides background and the status of the EVIP program; (2) supports prior EVIP expenditures; and (3) summarizes proposed changes to the program and the rationale behind them. Accompanying Mr. Campbell's testimony are the following exhibits:

- A. Confidential Exhibit RMP____(JAC-1), contains the summary of finances for the program. It categorizes the actual expenditures through the review period along with forecasted annual revenues and expenses.
- B. Confidential Exhibit RMP____(JAC-2), contains a detailed list of Company-owned Charger expenditures during the review period. The list contains itemized capital expenses by location.
- C. Exhibit RMP____(JAC-3), contains the charger port availability of Company-owned chargers that were operating during the review period. The exhibit shows percentage of time that each Company-owned charging port was available to customers for use.
- D. Confidential Exhibit RMP____(JAC-4) shows the Schedule 60 revenue collected at each of the Company-owned charging sites during the review period. The exhibit contains a breakdown of how users made payment.

- E. Exhibit RMP___(JAC-5) contains a list of all customer incentive projects that were awarded during the review period. The list includes the type of customer incentive, the year awarded, amount awarded, the year and amount paid.
- F. Exhibit RMP___(JAC-6) shows samples of screenshots from Plugshare, an EV user application and website where users post experiences regarding EV charging sites. The Exhibit contains sample comments from users at two sites that received EVIP customer incentives.

2. Additionally, in support of the Application, the Company submits the testimony of Kenneth Lee Elder, Jr. Mr. Elder's testimony presents the cost of service analysis and supports the proposed tariff changes to Schedules 60, 198 and 120. In support of his testimony, the following exhibits are provided:

- A. Exhibit RMP___(KLE-1) shows the summary of the results from the embedded cost of service study for the state of Utah. It summarizes, both by customer group and function, the results of the cost of service study for the 12-months ending December 31, 2024.
- B. Exhibit RMP___(KLE-2) shows the cost of service results in more detail by class and by function. Page 1 summarizes the total cost of service summary by class; pages 2 through 6 contain a summary by class for each major function; page 7 contains a summary by class and major function on a unit cost basis.
- C. The complete functionalized results of operations and embedded cost of service detail are included as Exhibit RMP___(KLE-3). Also included is a detailed narrative describing the Company's functionalization, classification, and allocation procedures.
- D. Exhibit RMP___(KLE-4) shows the effect of the Company's proposed Schedule 198.

- E. Exhibit RMP___(KLE-5) contains the proposed redlines to Schedule 60, Schedule 198 and Schedule 120 reflecting the Company's proposed changes.

ROCKY MOUNTAIN POWER'S PROPOSED CHANGES

3. Based on the Rocky Mountain Power's experience administering the EVIP for three years, the Company hereby proposes the following changes to the program and associated tariffs

- A. Company-Owned Chargers: As discussed in Mr. Campbell's testimony, the Company proposes allocating more EVIP funds toward Company-owned charging stations.

Utah Code § 54-4-41 explicitly authorizes investment in utility-owned vehicle charging infrastructure. PacifiCorp anticipates that these chargers will generate significantly more incremental revenue, which can benefit the Company's customers by offsetting the costs of the EVIP program and helping to lower electric rates—which is a stated statutory objective of the EVIP.² Further, the Company believes that focusing the EVIP program on Company-owned chargers should align with the scope envisioned by the Legislature.

- B. Incentives for Make-Ready Investments and Schedule 120 Rebates: As discussed in Mr. Campbell's testimony, the Company proposes eliminating new customer incentives under both make-ready investments and Schedule 120. The Company believes that the current customer incentives have already fulfilled their intended purpose. Continuing these incentives may be duplicative, potentially counterproductive, and unlike Company-owned charging stations, do not generate revenue that can be returned to customers.

² Utah Code 54-4-41(7)(b).

- C. Schedule 60 Revenues: As discussed in the testimony of Mr. Campbell, the Company proposes to amend the treatment of Schedule 60 revenues from Company-owned chargers to increase the percentage credited to electric utility customers in the Energy Balancing Account (“EBA”). The combination of this proposed change along with the incremental revenue from more Company-owned Charges will result in quantifiable benefits through credits to the EBA.
- D. Schedule 198 Rate Decrease: As discussed in the testimony of Mr. Elder, over the January 1, 2022 to December 31, 2024 timeframe collections for Schedule 198 - Electric Vehicle Charging Infrastructure Adjustment have averaged \$6.0 million per year, which exceeds the intended \$5 million per year. The Company is proposing a reduction in the rate for Schedule 198 to collect \$4.2 million per year so as to not collect more than the authorized \$50 million by year ten. Mr. Elder’s presents the tariff and bill impacts from of the Company’s proposed reduction in Schedule No. 198.
- E. Schedule 60: As provided in the testimony of Mr. Elder, the Company presents its findings for the cost of service analysis for the Company’s Schedule Electric Service Schedule No. 60 – Company Operated Electric Vehicle Charging Station Service (“Schedule 60”) and presents the Company’s recommendation for transitioning the prices for charging to cost of service. Mr. Elder also presents tariff and pricing for the Company’s incorporation of a proposed idling fee for Schedule 60.
- F. Elimination of Schedule 120: Mr. Elder’s testimony presents the proposed tariff changes to eliminate Electric Service Schedule No. 120 – Plug-in Electric Vehicle Incentive Pilot Program (“Schedule 120”).

CHANGES TO THE EVIP ARE IN THE PUBLIC INTEREST

4. Utah Code 54-4-41(4) identifies the following criteria for evaluating the public interest of the EVIP (a) increases the availability of electric vehicle battery charging service in the state; (b) enables the deployment of infrastructure that supports electric vehicle battery charging service and Company-owned charging stations in a manner expected to increase electric vehicle adoption; (c) includes an evaluation of investments in the areas of the jurisdictional land, defined in Utah Code section 11-58-102 (the Inland Port) and the point of the mountain land, defined in Utah Code section 11-59- 102 (Point of Mountain); (d) enables competition, innovation, and customer choice in charging service, while promoting low-cost services for electric vehicle battery charging customers; and (e) provides for ongoing coordination with UDOT.³

5. The Company's proposed changes to the EVIP will increase the availability of electric vehicle battery charging service in the state. As described by Mr. Campbell, the Company is in the process of investing in twenty Company-owned charging stations with four to eight individual chargers at each site, located strategically throughout the state to fill charging gaps.

6. The EVIP enables the significant deployment of infrastructure that supports battery charging service and Company-owned charging stations in a manner that is reasonably expected to increase electric vehicle adoption through ongoing coordination by the Company and UDOT to identify statewide charging needs along with potential locations for high volume electric vehicle users. This targeted process for the strategic selection of Company-owned charging station locations compliments existing charging stations to create a robust charging network in the state. Such a network is reasonably anticipated to increase electric vehicle adoption because it will

³ See Utah Code Ann. § 54-4-41(a) – (e).

address a significant concern that studies have shown to be a barrier in electric vehicle adoption, namely, the lack of availability of charging service and the fear of becoming stranded.

7. Rocky Mountain Power is working with representatives from the Point of the Mountain Development Commission and the Utah Inland Port Authority to implement investments as described by Mr. Campbell. The Company has signed Cooperation Agreements with both entities, and it will continue to work with the entities as required by section 54-4-41(4)(c) of the Utah Code.

8. The EVIP has enabled competition, innovation, and customer choice in electric vehicle battery charging services, while promoting low costs. By increasing the availability of charging station locations throughout the state, the EVIP provides additional access to charging services for electric vehicle owners. In the first three years of the program, EVIP committed \$15,398,744 in funding for make-ready incentives and Schedule 120 rebates that to support competition for charging services. The prices for the Company's charging service are competitive and the rates are discounted for Rocky Mountain Power customers, reflecting the customers' contributions to the Company-owned infrastructure. The Company will ensure that infrastructure investments under the EVIP are innovative and employ the latest technology by continuing to partner and engage with leading experts in electric vehicle technology like Utah State University, the University of Utah, the U.S. Department of Energy, the Utah Transit Authority, and the Utah Office of Energy Development.

9. The Company has been engaged in ongoing discussions and coordination with UDOT regarding the development of a statewide electric vehicle charging network since the inception of the EVIP, and UDOT has provided valuable input into the development of the EVIP. The Company participates in the State's Electrification of Transportation Steering Committee that

is chaired by UDOT. The Company and UDOT have agreed to continue their collaborative efforts as the EVIP is implemented, as required by Utah Code section 54-4-41(4)(e).

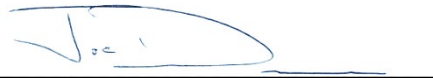
WHEREFORE, by this Application, Rocky Mountain Power respectfully requests that the Commission:

- (1) approve the requested amendments of the EVIP program, as provided herein; and,
- (2) approve the tariff sheets, as filed, with an effective date of January 1, 2026.

DATED this 25th day of July 2025.

Respectfully submitted,

ROCKY MOUNTAIN POWER

A handwritten signature in blue ink, appearing to read "Joe Dallas", is written over a horizontal line.

Joe Dallas

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Salt Lake City, Utah 84116

Email: joseph.dallas@pacificorp.com

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 20-035-34

I hereby certify that on July 25, 2025 a true and correct copy of the foregoing was served by electronic mail to the following:

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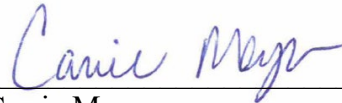
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