

WRA EXHIBIT____(DK-2)

PacifiCorp's Redacted Response to
WRA Data Requests 3.2 & 3.3

20-035-34 / Rocky Mountain Power

September 16, 2025

WRA Data Request 3.2

WRA Data Request 3.2**Make-ready programs.**

- (a) See Direct Testimony of James A. Campbell, 19: 389-391. Admit that the Company's observation that "some third-party incentive recipients delay repairing broken equipment, resulting in poor user experience" is anecdotal evidence and that the Company has not reviewed the uptime of all third-party incentive recipients' chargers. If denied, please provide the Company's complete analysis of the performance, maintenance, and user experience of third-party incentive recipients.
- (b) See Direct Testimony of James A. Campbell, 23: 482-485. Please provide all documentation that the Company has on its observations of site performance of awarded chargers.
- (c) See Direct Testimony of James A. Campbell, 22-23: 469-473. Please provide the number of customers that have submitted multiple applications under different names for similar projects.
- (d) See Direct Testimony of James A. Campbell, 22-23: 469-473. Provide all documentation supporting the claim that the Company has experienced "gaming" from applicants. Include all relevant information for each instance of applicants requesting reimbursement for unallowable costs, submitting applications under different names, and any other inappropriate conduct within the "range" referenced in line 470.
- (e) Please provide the locations and site operators for Customer Incentive Sites 1 & 2 used in exhibit RMP__(JAC-6).

Confidential Response to WRA Data Request 3.2

(a) The Company did not have access to the uptime of all third-party incentive recipients' chargers. Instead, the Company conducted qualitative assessments of the sites by performing site visits and evaluating user comments from PlugShare. For documentation of site visits see Attachment WRA 3.2-1 for staff field logs and Attachment WRA 3.2-2 for photos of site visits. Further, the Company evaluated user comments from PlugShare, a third-party, publicly facing website that allows users to "check-in" and rate their charging experience for EV chargers on the website. PlugShare has an average user score for each individual location, with 10 being the highest score possible. See the table in the Company's response to WRA 3.1 column M which contains the plugin score for each incentive recipient that had a plugin score (not every project is registered on PlugShare). The average PlugShare score for all recipients was 7.3. For comparison, the four Company owned sites that were operating in 2024 have an average score of 10.

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The Company evaluated the PlugShare data for the funded projects. Of the 155 projects funded 72 had user evaluations. Approximately 36% of those were flagged as being under repair or not working properly. The table below summarizes the evaluation.

	Count	Percent of projects on Plugshare
Total Projects Funded through 2024	155	N/A
Projects on PlugShare	72	100%
Projects with Ratings on PlugShare	44	61%
Average PlugShare Rating	7.3	N/A
Weighted Average PlugShare Rating against number of checkins	7.3	N/A
Average number of checkins per site	42	N/A
Number of sites not working, under repair, or not rated	26	36%

(b) See Attachment WRA 3.2-1 for staff field logs and Attachment WRA 3.2-2 for photos of site visits; and see attachment WRA 3.2-3 for PlugShare Observations that the Company shared with interested parties on May 28, 2025 as part of an EVIP workshop.

(c) The Company believes an EV developer has changed name three times and worked with 7 different property management/ property owner groups to submit over 100 applications.

(d) [REDACTED]

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PacifiCorp notes that WRA 3.2-4 CONF contains customer specific information and request special consideration and handling.

(e)



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State-wide and federal incentive funding.

- (a) See Direct Testimony of James A. Campbell 24: 506-513. Please provide any analysis the Company has performed that supports the claim that the programs from UDOT and DEQ “are sufficiently funded and should provide enough incentives for the 4 market to support competition and EVIP funded incentives are no longer needed.” If no analysis has been conducted, please admit that this statement is conjecture.
- (b) Please confirm that the UDOT and DEQ programs do not provide funding for the installation of EV charging at single family residences.
- (c) Please describe how the Company has considered the elimination and phase out of EV charging tax credits contained in the recent federal reconciliation bill (also known as the H.R. 1 Reconciliation Bill) in its suggested modifications to the EVIP program.

Response to WRA Data Request 3.3

PacifiCorp objects to this request to the extent that it seeks information from a third party entity that is not within the Company’s possession. Subject to and without waiving the foregoing objection, PacifiCorp responds as follows:

- (a) After discussing the programs with staff from DEQ and UDOT that there are \$10’s of millions of dollars in incentives available to the market in Utah, it is the professional judgment of Company EV charging experts that those additional programs will support competition.
- (b) The Company does not know if DEQ or UDOT provide funding for EV charging for single family residences.
- (c) The Company did not have any evidence that federal EV charging tax credits impacted the EVIP program. As such, the tax credit elimination did not affect the proposed modification.