

**IN THE MATTER OF ROCKY MOUNTAIN
POWER'S APPLICATION FOR APPROVAL
OF AMENDMENTS TO THE ELECTRIC
VEHICLE INFRASTRUCTURE PROGRAM
AND TARIFF REVISIONS**

DOCKET No. 20-035-34
Exhibit No. DPU 1.0 DIR
3-Year Program Review

FOR THE DIVISION OF PUBLIC UTILITIES
DEPARTMENT OF COMMERCE
STATE OF UTAH

October 3, 2025

CONTENTS

INTRODUCTION	1
PURPOSE OF TESTIMONY	2
SUMMARY AND RECOMMENDATIONS	3
LEGISLATIVE AND PUBLIC INTEREST REQUIREMENT	6
PROGRAM REPORTING REQUIREMENTS AND PROGRESS	10
RMP's PROPOSED EVIP PROGRAM CHANGES	15
CONCLUSION	19
APPENDIX A – DPU DATA REQUESTS OVER 3-YEAR REPORTING PERIOD	21

1 **INTRODUCTION**

2 **Q: Please state your name and occupation.**

3 A: My name is Robert A. Davis. I serve in the capacity of Utility Technical Consultant at
4 the Utah Department of Commerce - Division of Public Utilities (Division).

5 **Q: What is your business address?**

6 A: My business address is 160 East 300 South, Heber Wells Building - 4th Floor, Salt
7 Lake City, Utah, 84111.

8 **Q: On whose behalf are you testifying?**

9 A: The Division.

10 **Q: Please describe your educational and professional experience.**

11 A: I have an MBA with Master Certificates in finance and economics from Westminster
12 College. I hold a Certified Rate of Return Analyst (CRRRA) designation from the
13 Society of Utility and Regulatory Financial Analysts. I have attended the National
14 Association of Regulatory Utility Commissioners (NARUC) Rate School, MSU/IPU
15 Advanced Regulatory Studies Program, and Depreciation Fundamentals by the
16 Society of Depreciation Professionals. I have attended several regulatory seminars
17 and conferences either in person or virtually. I have been employed by the Division
18 since May of 2012.

19 **Q: Please describe your current position responsibilities.**

20 A: My responsibilities include financial, economic, and accounting analysis of regulated
21 utility matters.

22 **Q: Have you previously testified before the Public Service Commission of Utah**
23 **(Commission)?**

24 A: Yes. I have testified several times before the Commission. I provided testimony in
25 this docket on November 22, 2021.

26 **PURPOSE OF TESTIMONY**

27 **Q: What is the purpose of your testimony?**

28 A: My testimony introduces the Division's other witness and offers a three-year review
29 of the Electric Vehicle Infrastructure Program (EVIP or Program). I offer a review of
30 the EVIP enabling statute, the legislative objectives set forth for the Division, and the
31 EVIP statute's public interest requirement. Finally, I address Rocky Mountain
32 Power's (RMP or Company) proposed changes to the EVIP Program.

33 **Q: Please identify the Division's witnesses providing testimony and the topics**
34 **they address.**

35 A: The Division's witnesses for this docket include:

- 36 • Mr. Robert A. Davis – I provide testimony for the Division's review of the
37 testimony provided by RMP witnesses Mr. James A. Campbell and Mr. Kenneth
38 Lee Elder, Jr. and evaluate the RMP Program's compliance with the public
39 interest and prudence requirements. I also address the Division's review of the
40 EVIP progress over the past 3 years. Finally, I address RMP's proposed changes
41 to the EVIP program.
- 42 • Mr. Matt Pernichele - Mr. Pernichele will provide testimony about the Division's
43 review of RMP's proposed idling charge, cost of service/rate design changes,
44 and the Company's existing and planned charger locations.

SUMMARY AND RECOMMENDATIONS

Q: Please summarize the ongoing work and investigation that has been performed in this docket since the inception of the program.

A: The Division has reviewed RMP's three-year review of the Program including the testimony and exhibits of RMP witnesses Mr. James A. Campbell and Mr. Kenneth Lee Elder, Jr. Over the course of the program, up to RMP's filing of this three-year review, the Division has submitted fifty-four data request questions seeking explanation, clarification, and additional support for the assumptions and concepts used by RMP as the EVIP progresses. The Division has reviewed RMP's responses to the data requests and those of other stakeholders. The Division has also participated in discussions with RMP representatives and other stakeholders to obtain additional information and clarification on multiple aspects of RMP's Program and has made recommendations to the Commission in each of the past three years.¹

Q: Would you provide a synopsis of the Division's analysis and conclusions for the Program over the past three years?

A: Yes. RMP's Program has performed relatively well over the past three years and satisfied the statutes enabling the Program. The Division has raised minor concerns with RMP regarding the prudence of the Program over the reporting period that I will explain further throughout my testimony. The Division has recommended the Commission acknowledge with recommendations RMP's filings in each of the past three years of reporting. In response to those recommendations, RMP has clarified

¹ See Division Comments in *Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program*, Docket Nos. 23-035-18, 24-035-17, and 25-035-23.

66 or implemented changes to its EVIP Program balance sheet and reporting template
67 as the Program has progressed.

68 Given the demonstrative nature of this Program, in which industry best practices are
69 used in the EVIP development and the Company has been given some latitude to
70 implement ideas despite limited data and lack of evidentiary support for their
71 prudence, the Division views the public interest as requiring a higher level of scrutiny
72 to ensure that the Program is prudent and in the public interest.

73 With the Division's and other Parties' suggested modifications, the Program seems
74 to be operating as approved by the Commission. The Division has seen no evidence
75 suggesting that competition has been stifled. Ratepayer impacts have been
76 maintained at reasonable levels, and factual reporting of outcomes to stakeholders
77 has been timely and informative. This has allowed stakeholders to monitor the
78 progress of the Program and provided the Commission with the information
79 necessary to modify the Program as requested by the parties.

80 **Q: Please provide your recommendations to the Commission.**

81 A: The adoption of EVs and charging technology continue to evolve. A simple Google
82 search asking "What is the Largest Obstacle in EV Adoption" implies a tie between
83 high upfront costs of EVs and lack of accessible, reliable charging infrastructure.
84 While there are too many source documents to note here in support of this

85 observation,² it is clear that there remains a need for reliable EV charging
86 infrastructure throughout Utah.

87 Based on my testimony and the testimony provided by Division witness Mr.
88 Pernichele, the Division recommends the Commission continue to support RMP's
89 Program with the original limitations of the ten years and \$50 million.

90 For the seven years remaining in the program, the customer surcharge rate should
91 be reviewed and adjusted annually as long as RMP continues to report Program
92 spending in such a way that stakeholders can verify the prudence of the Program
93 and it continues to be in the public interest as defined under Utah Code Annotated
94 section 54-4-41.³ This reporting would be in addition to the report that RMP is
95 required to provide to the Utah Legislature.⁴ In addition to these recommendations,
96 the Division offers the following recommendations pertaining to RMP's proposals in
97 this filing:

- 98 1. RMP should continue to provide stakeholders the EVIP Balance Sheet in Excel
99 format with intact formulae, including the accounting of the program revenues,
100 expenses including make-ready and rebate incentives, partnerships, outreach,
101 innovation projects, and carrying charge from inception, along with best forecasts
102 for remaining years of the Program.
- 103 2. The Division supports RMP's proposed changes to the EBA 50/50 allocation
104 offset to tariff Schedule 60. The Division recommends the allocation move to
105 100-percent EBA offset at the six-year review of the program or at the time
106 Company-owned chargers have been installed and providing EV charging at
107 twenty locations, whichever occurs first.

² Barriers and motivators to the adoption of electric vehicles: A global review, ELSEVIER Volume 3 Issue 2, April 2024 (last visited Oct. 1, 2025) <https://www.sciencedirect.com/science/article/pii/S2773153724000057>.

³ Utah Code Ann. § 54-4-41.

⁴ Utah Code Ann. § 54-4-41(8).

- 108 3. The Division does not have a strong opinion about the Schedule 120 Rebates
109 and make-ready incentives. However, it understands the need to support
110 charging infrastructure for multi-family dwellings. The Division recommends the
111 Commission continue the Schedule 120 rebates and make-ready incentives to
112 allow RMP to build out its remaining 20 charging sites and provide funding for
113 multi-family dwelling charging infrastructure at a 70/20 allocation, with the 10
114 percent remaining for awarded innovation and partnership projects.
- 115 4. The Division supports adding an idling charge as proposed by Mr. Kenneth Lee
116 Elder, Jr. Division witness Mr. Matt Pernichele discusses the idling charge in his
117 direct testimony.
- 118 5. The Division's understanding is that the Program has not acquired enough
119 operating data to move it to full cost of service at this time. The Division
120 recommends the Commission approve the adjustments to the customer
121 surcharge under tariff Schedule No. 198 and adjustments to Schedule No. 60, as
122 explained by Mr. Pernichele in his direct testimony.
- 123 6. The Division has concerns with RMP's current and proposed charging locations
124 as further explained by Mr. Pernichele. The purpose of the Company's currently
125 owned and proposed charger locations is to provide fast, reliable EV charging
126 infrastructure throughout Utah for residents of Utah and to those passing
127 through. The Division is not opposed to the Company's existing, planned, and
128 future charging sites, but care should be taken to strategically place stations to
129 comply with the Program mandates and not solely to be used as revenue
130 generation for the Program.

131 **LEGISLATIVE AND PUBLIC INTEREST REQUIREMENT**

132 **Q: Will you briefly review the background and factual framework surrounding this**
133 **docket?**

134 A. Yes. On August 23, 2021, RMP filed its application with the Commission pursuant to
135 Utah Code Annotated section 54-4-41, also known as H. B. 396 (2020) — Electric
136 Vehicle Charging Infrastructure Amendments, requesting approval of its EVIP.⁵

⁵ *Rocky Mountain Power's Application for Approval of Electric Vehicle Infrastructure Program Authorized by Electric Charging Infrastructure Amendments*, Docket No. 20-035-34, Application (August 23, 2021).

137 RMP requested approval from the Commission for ratepayers to fund up to \$50
138 million over ten years to cover costs and expenses associated with the deployment
139 of both utility-owned and non-utility-owned electric vehicle charging infrastructure
140 and vehicle charging service.⁶ RMP proposed to move the program to full cost of
141 service, if successful, from years six to ten of the Program. In addition to the utility-
142 owned charging infrastructure, the Program provides incentives for make-ready
143 infrastructure investment to help non-utility EV charging operators construct their
144 own charging stations. The Program also offers incentives to third-party operators for
145 the purchase of chargers and allows RMP to participate in innovative partnerships
146 and projects with other entities throughout the State of Utah.

147 With Commission approval, RMP implemented Electric Service Schedule No. 198 —
148 Electric Vehicle Infrastructure Program (EVIP) Cost Adjustment (customer
149 surcharge) and Schedule No. 60 — Company Operated Electric Vehicle Charging
150 Station Service (collection of associated revenues from Company-owned chargers).
151 RMP also proposed an extension of Electric Service Schedule No. 120 — Plug-in
152 Electric Vehicle Incentive Pilot Program for the duration of the EVIP.

153 **Q: Please explain how the legislative principles and Division objectives under**
154 **Utah Code Annotated section 54-4a-6 pertain to this docket.**

155 **A:** The EVIP statute provides criteria for determining whether this Program is in the
156 public interest.⁷ In evaluating the criteria, the Division is also informed by its general

⁶ Utah Code Ann. § 54-4-41(2)(a).

⁷ Utah Code Ann. § 54-4-41(4).

statutory guidance concerning the public interest.⁸ Although the legislative principles and objectives in section 54-4a-6 are the guiding force behind the Division's day-to-day activities, the Division's main statutory duty in this matter is to determine if this Program continues to be in the public interest as articulated in section 54-4-41.

Q: Please explain the public interest requirements for the EVIP program.

A: Utah Code Annotated section 54-4-41(4) provides the criteria that the Commission must use to determine whether the Program is in the public interest:

The commission shall find a charging infrastructure program to be in the public interest if the commission finds that the charging infrastructure program:

- (a) increases the availability of electric vehicle battery charging service in the State;
- (b) enables the significant deployment of infrastructure that supports electric vehicle battery charging service and utility-owned vehicle charging infrastructure in a manner reasonably expected to increase electric vehicle adoption;
- (c) includes an evaluation of investments in the areas of the authority jurisdictional land, as defined in Section 11-58-102, and the point of the mountain state land, as defined in Section 11-59-102;
- (d) enables competition, innovation, and customer choice in electric vehicle battery charging services, while promoting low-cost services for electric vehicle battery charging customers; *and*
- (e) provides for ongoing coordination with the Department of Transportation, created in section 72-1-201.⁹

⁸ Utah Code Ann. § 54-4a-6.

⁹ Utah Code Ann. § 54-4-41(4).

181 The Division notes that subsection 54-4-41(7) separately addresses whether
182 expenses are prudently incurred. This subsection appears to apply after the
183 expenditure of funds, not in the initial evaluation of a program.

184 **Q: Has RMP met the public interest requirements over the past three years?**

185 A: Yes. While the Program is only three years into its ten-year horizon, each of the
186 three reporting periods illustrate RMP's commitment to adhering to the requirements
187 of subsection 54-4-41(4). RMP has been cooperative to implement the Division's
188 recommendations for revisions to the EVIP reporting template where clarification
189 was needed in support of the public interest requirement.¹⁰

190 **Q: Will you briefly review subsection 54-4-41(7)'s prudence standard for Program**
191 **expenses?**

192 A: Yes. Subsection 54-4-41(7) outlines the prudency requirements of a large-scale
193 utility-owned investment in vehicle charging infrastructure.¹¹ The Division concludes
194 that with the exception of subsection 54-4-41(7)(a), RMP is complying with this
195 standard.

196 **Q: Please elaborate on the exception to subsection 54-4-41(7)(a).**

197 A: Subsection 54-4-41(7)(a) requires a large-scale utility to prudently invest in one or
198 more projects that are in the public interest to reduce transportation sector emissions
199 over a reasonable time period as determined by the Commission.¹² RMP has not

¹⁰ Division Comments, Conclusions and Recommendations, *supra* note 1.

¹¹ Utah Code Ann. § 54-4-41(7).

¹² Utah Code Ann. § 54-4-41(7)(a).

provided any substantial information or data since the approval of the Program to demonstrate that the Company-owned charging infrastructure or Program in general has reduced transportation sector emissions. However, the Division acknowledges the Program has not produced enough meaningful data to make a determination in the reduction of sector emissions and expects RMP will address this requirement as data becomes available in future annual reports or Program reviews.

PROGRAM REPORTING REQUIREMENTS AND PROGRESS

Q: Will you provide a synopsis of the Program reporting and progress over the past three years?

A: Yes. While the statute requires annual reporting to the Public Utilities, Energy, and Technology Interim Committee of the Legislature,¹³ the Commission approved the Parties' request of annual reporting to the Commission and stakeholders.¹⁴

Q: Has RMP complied with the Stipulation requirements approved by the Commission?

A: Yes. The Commission's order approved an annual report that directed RMP to contain enough information about the Program to allow stakeholders to determine if the Program is operating in the public interest and whether expenditures have been prudent. This information includes revenues, expenses, projections, or other studies, including assumptions used.¹⁵ The Division notes that the reporting template is a work in progress and RMP has been amenable to revisions as requested by the

¹³ Utah Code Ann. § 54-4-41(8).

¹⁴ Order Approving Proposed Report, (June 15, 2022), <https://pscdocs.utah.gov/electric/20docs/2003534/3245182003534oapr6-15-2022.pdf>.

¹⁵ Rocky Mountain Power's Reply Comments on the EVIP Proposed Report, (May 5, 2022), <https://pscdocs.utah.gov/electric/20docs/2003534/323898RMPrplyCmntsEVIPPrpsdRprt5-5-2022.pdf>.

220 Division and other parties, as noted through its responses to data requests since the
221 Program's inception. This is included in Appendix A of my testimony.

222 **Q: Will you provide a synopsis of the EVIP Accounting over the review period.**

223 A: Yes. RMP has provided Attachment A – EVIP Accounting, in each of its past three
224 annual reports. As the Program progresses, RMP has made any necessary changes
225 to the reporting spreadsheet that identifies Schedule Nos. 198 and 60 revenues,
226 expenses relating to Company chargers, incentives under Schedule No. 120 and
227 make ready charger Incentives, capital spend for Company chargers and make
228 ready infrastructure, along with carrying charges. RMP's EVIP Accounting
229 spreadsheet shows a beginning balance and ending balance for the reporting period.

230 **Q: Has RMP continued to update its reporting template?**

231 A: Yes. At the conclusion of comments and reply comments from the parties in the
232 current annual report, RMP responded to requests to revise its EVIP Accounting
233 spreadsheet to include prior year totals, current year "monthly results", and annual
234 totals, along with projected revenues and expense for the remainder of the
235 Program.¹⁶ The Division notes that RMP continually updates Attachment B, Sections
236 1 a-d, as needed to demonstrate the progress of the Program and includes a
237 summary under Section 1e.¹⁷

¹⁶ *Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program*, Docket No. 25-035-23, Rocky Mountain Power's Reply Comments (May 19, 2025), <https://pscdocs.utah.gov/electric/25docs/2503523/339825RMPReplyCmnts5-19-2025.pdf>.

¹⁷ *Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program*, Docket No. 25-035-23, Rocky Mountain Power's 2024 Annual Report (April 1, 2025), <https://pscdocs.utah.gov/electric/25docs/2503523/3390462024AnlRprt4-1-2025.pdf>.

238 **Q: Will you provide a synopsis of the progress of the Program over the past three**
239 **years?**

240 A: Yes. RMP provides a summary of the 2024 annual report in its Attachment B,
241 Section 1e. RMP notes that the balancing account provided in Attachment A only
242 reflects actual payments and actual revenues from Schedule Nos. 198 and 60 but
243 does not illustrate future commitments. RMP also reports challenges with
244 development of high-powered charging sites resulting from significant delays
245 occurring between the decision to move forward with projects and actual operation.¹⁸
246 While this information is informative, the Division has raised concerns with revenue
247 collections and reporting of future commitments in its annual prudency reviews and
248 noted the significant delays resulting from equipment lead times.

249 **Q: Does the Division agree with RMP's summary of the Program over the past**
250 **three years?**

251 A: Yes. The Division agrees with RMP's 2024 Program year summary since RMP
252 started reporting. However, as mentioned above, the Division has raised concerns
253 with the amount of revenue collected under Schedule 198.

254 **Q: Please explain the Division's concerns with the balancing account.**

255 A: The Division has two main areas of concern with the balancing account. First, the
256 Division has raised concerns with the over-collection of annual revenues from
257 customers under Schedule 198. Second, and less significant, is RMP's reporting

¹⁸ *Id.*, Appendix B, Section 1e, at 15.

258 expenses that are committed to but have not actually occurred during the reporting
259 period.

260 **Q: Please explain the Division's concerns with the over-collection of annual**
261 **revenues under Schedule 198.**

262 A: Subsection 54-4-41(2) provides \$50 million of program funding approved by the
263 Commission to collect \$5 million annually under Schedule 198 for a period of ten
264 years.¹⁹ The Division and RMP have disagreed with the interpretation of how
265 revenues may be collected under Schedule 198 over the three-year reporting period.
266 In each of the annual reporting periods, the Division has raised concerns in each of
267 the annual reporting periods that RMP has been over-collecting Schedule 198
268 revenues from customers. RMP reports Schedule 198 revenues of \$5,467,870,
269 \$5,905,778, and \$6,649,831 for years 2022, 2023, and 2024, respectively.²⁰

270 **Q: Has RMP addressed the Division's concerns?**

271 A: Yes. RMP has acknowledged the over-collection and is proposing to adjust
272 Schedule 198 to collect the approved annual amount. Division witness Mr.
273 Pernichele explains this adjustment in his direct testimony.

274 **Q: Please address the Division's concerns with the reporting of the committed**
275 **funds.**

¹⁹ Order Approving Settlement Stipulation (Dec. 20, 2021), Key Settlement Provisions, Section 3 Schedule 198, at 6, <https://pscdocs.utah.gov/electric/20docs/2003534/3215702003534oass12-20-2021.pdf>.

²⁰ *Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program*, Docket No. 25-035-23 (May 19, 2025), Rocky Mountain Power's Reply Comments (May 19, 2025), RMP EVIP Attachment-Accounting and Reconciliation, <https://psc.utah.gov/2025/04/01/docket-no-25-035-23/>.

276 A: The Division understands the high-power charging site delays RMP is experiencing
277 between project approval and actual operation date. And for various reasons, a
278 project may be approved in one year, but it may be two or more years before that
279 project goes into operation. However, because RMP only reports actual revenues
280 and expenses in any given year, the prudency review of the Program raises
281 questions of the actual Program accounting that does not include commitments that
282 have not yet been recorded in the balancing account.

283 **Q: Would you provide an example of the issue?**

284 A: Yes. While the Division has verified the committed funds over the three-year
285 reporting period in its annual prudency reviews, it raised concerns that the
286 committed Program funds of \$33,657,887 (including Schedule 120 rebates, make-
287 ready incentives, and innovation projects) were outpacing anticipated Schedule 198
288 revenues to be collected over the ten-year life of the Program. Due to the
289 overcollection, the Division is skeptical that the Program will remain within the \$50
290 million allowed funding cap. The Division notes that committed funds and actual paid
291 out funds are different (\$13,715,357 of committed funds have been paid). Charging
292 revenues under Schedule 60 are split, with 67 percent to support Company EVIP
293 charging infrastructure expenses and 33 percent to offset EBA net power costs.
294 However, the committed funds are reported in the event that the incentives will be
295 awarded at the committed value.

296 **Q: Has RMP offered to change its reporting to address the Division's concerns**
297 **with the committed funds?**

298 A: Yes. RMP agrees that the annual EVIP accounting should only include actual
299 revenues and expenses. In an effort to review the prudence of the Program from
300 inception-to-date, RMP agrees to provide the following:

- 301 1. Prior year's totals; and future forecasted revenues and expenses including
302 commitments,
- 303 2. current reporting period amounts by month; and
- 304 3. future forecasted revenues and expenses including commitments.

305 The information will be provided and illustrated in Excel format with intact formulae
306 as a separate document to each of RMP's annual report filings until the EVIP
307 concludes.²¹

308 **RMP'S PROPOSED EVIP PROGRAM CHANGES**

309 **Q. Does the Division have an opinion on the changes RMP is proposing to the**
310 **Program?**

311 A: Yes. In addition to the recommendations mentioned above regarding the EVIP
312 Accounting, the Division offers its recommendations to RMP's proposals in this filing.
313 The Division reserves its right to revise its recommendations in future filings based
314 on new information or other stakeholders' recommendations.

315 **Q: Does the Division have a recommendation for RMP's change to the EBA**
316 **allocation?**

²¹ *Id.* at 1-3.

317 A: Yes. Subsection 54-4-41(7)(b) directs RMP, the large-scale utility, to provide its
318 customers significant benefits that may include revenue from utility vehicle charging
319 service that offsets the utility's costs and expenses. RMP's use of revenues under
320 Schedule 60 to offset the EBA meets this requirement. RMP's proposed change to
321 move from a 37 percent offset to a 50 percent allocation makes sense at this time.
322 The Division recommends the Commission approve this change. In addition, the
323 Division recommends the EBA allocation move to 100 percent at the next three-year
324 review of the program or at such time the Company-owned chargers have been
325 installed and providing EV charging at twenty locations, whichever occurs first.

326 **Q: What is the Division's understanding of RMP's proposed discontinuation of**
327 **Schedule No. 120 rebates and make-ready Incentives?**

328 A: RMP is proposing to discontinue Schedule 120 rebates and make-ready incentives
329 and use those funds to cover costs for Company-owned charging infrastructure.
330 RMP cites several reasons for discontinuing these programs: revenue generation
331 through Schedule 60 charging revenues, administrative challenges managing the
332 rebates and incentives including gaming by some applicants, third-party equipment
333 reliability issues, other non-RMP incentive resources and aligning the Program with
334 the statutory directives that focus on utility-owned infrastructure not incentives.²²

²² Direct Test. of James A. Campbell (July 25, 2025), at 18-19:380-396,
<https://pscdocs.utah.gov/electric/20docs/2003534/340800RdctdDirTstmnyJamesACampbellRMP7-25-2025.pdf>.

Q: Would you provide a synopsis of RMP's management of the Schedule 120 rebates and make-ready incentives?

A: Yes. RMP witness, Mr. Campbell, in his direct testimony at lines 312-315, Table 3, illustrates the ratios of allocated funds for total Company-owned, Customer Incentive Awards, Make Ready Awards, and Total Innovation further broken down by make-ready only and both Schedule 120 rebate and make-ready. Mr. Campbell claims that the ratios between Company-owned, make-ready incentives and innovation projects are 49 percent, 41 percent, and 10 percent, respectively, illustrated in the "% MR Only" column, which are consistent with the percentages in the Settlement Stipulation.²³ The Division notes there is some ambiguity in Table 3, making it difficult to fully understand the actual allocated funds but concludes that the difference is not significant. For example, the Table 3 column labeled "% All" illustrates Company-owned, make-ready incentives, and innovation projects are 45 percent, 46 percent, and 9 percent, respectively.²⁴ Also, it's worth noting that Table 3 illustrates awarded funds, not actual paid funds to calculate the ratios in this report. The DPU's analysis of the ratios for actual paid-to-date Company-owned, make-ready incentives, and innovation projects are 80 percent, 20 percent, and 0 percent, respectively.²⁵ The Division agrees with Mr. Campbell that it is appropriate to use

²³ Settlement Stipulation (Nov. 17, 2021) at 10, ¶ 41 (Company-owned chargers (45 percent), make-ready investments (45 percent), and innovative projects and partnerships (10 percent)), <https://pscdocs.utah.gov/electric/20docs/2003534/321212StlmntStpltn11-17-2021.pdf>.

²⁴ Direct Testimony of James A. Campbell (July 25, 2025), at 15.

²⁵ Davis Ex. 1.1_RMP Response to DPU Data Request 1.7 in Docket No. 25-035-23-April 12, 2025_10-3-25, (Oct. 3, 2025), Tab Customer Incentives. The Division assumes in its analysis that the Company-owned Schedule 120 rebates and Make-ready incentives were awarded and paid.

353 awarded funds as the tracking metric versus actual paid due to timing delays of
354 awarded projects to actual paid; plus, knowing the awarded amounts better informs
355 the prudence of the current accounting balance to the project ending balance total of
356 \$50 million.²⁶

357 **Q: What are RMP's proposed changes to Schedule 120 rebates?**

358 A: RMP proposes the discontinuation of Schedule 120 rebates and to use those
359 remaining uncollected funds to build out its own charging infrastructure.²⁷ The
360 Division's review of Schedule 120 rebate confirms RMP's termination of rebates as
361 of January 1, 2025, unless the Commission approves its continuation.²⁸

362 **Q: Does the Division agree with RMP's proposal to discontinue the Schedule 120**
363 **rebates and make-ready incentives?**

364 A: The Division supports RMP's proposal to continue paying Schedule 120 rebates and
365 make-ready incentives that have been awarded, but not paid, pending final
366 installation. However, the Division still sees a need for multi-family dwelling charging
367 infrastructure even though actual paid non-Company-owned rebates and incentives
368 are a low percentage of the total. Multi-family housing poses unique challenges for
369 residents hoping to adopt electric vehicles. Given preferences for at-home charging
370 by electric vehicle users, it is important to provide an avenue for such charging to a

²⁶ Direct Test. of James A. Campbell (July 25, 2025), at 15:305-10.

²⁷ *Id.*, at 18:373-77.

²⁸ Electric Service Schedule No. 120 (effective April 25, 2025), at 120.3,
https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/rates-regulation/utah/rates/120_Plug-in_Electric_Vehicle_Incentive_Pilot_Program.pdf.

371 broad portion of the public. As multi-family housing grows as a share of the housing
372 stock, ensuring charging infrastructure extends there is in the public interest.

373 **Q: Does the Division have a recommendation for Schedule 120 rebates and make-**
374 **ready incentives?**

375 A: The Division recommends the Commission continue the rebates and incentives at 70
376 percent for Company-owned, 20 percent for multi-family, leaving 10 percent for
377 innovation and partnerships that have been awarded but not paid. This seems
378 logical based on past performance of the Program allowing RMP to build out its 20
379 charging sites, continue to offer funds to build multi-family dwelling infrastructure,
380 and fund the innovative and partnerships already awarded.

381 **Q: Has the Division evaluated RMP's proposed idling charge?**

382 A: Yes. Division witness Mr. Pernichele addresses the proposed idling charge in his
383 direct testimony.

384 **CONCLUSION**

385 **Q: Would you summarize the Division's review and conclusions for RMP's EVIP**
386 **program?**

387 A: Yes. The Division has reviewed RMP's three-year review of the Program including
388 the testimony and exhibits of RMP witnesses Mr. James A. Campbell and Mr.
389 Kenneth Lee Elder, Jr. and the data request responses to other parties' inquiries.

390 RMP's Program has performed relatively well over the past three years and appears
391 to comply with the statutes enabling the Program. The Division has raised minor
392 concerns with RMP regarding the prudence of the Program over the reporting period.

393 The Program seems to be generally operating as proposed in RMP's initial
394 application after stakeholder input, adjustments to the Program, and approval by the
395 Commission. The Division has seen no evidence suggesting that competition has
396 been stifled. Ratepayer impacts have been maintained at reasonable levels, and
397 factual reporting of outcomes to stakeholders has been timely and informative
398 allowing stakeholders to monitor the progress of the Program and the Commission
399 the ability to modify the Program as requested by the parties.

400 **Q: Does this conclude your testimony?**

401 **A:** Yes.

APPENDIX A – DPU DATA REQUESTS OVER 3-YEAR REPORTING PERIOD

Docket No. 23-035-18

DPU Data Request 1.1

In reference to Attachment B, Section 1a – Company Owned Charging Stations, Requests for Proposals, page 1, how many companies responded to RMP’s request for proposals? Does the winning bid propose to use subcontractors? If so, please list them and describe what parts of the scope the subcontractors are responsible for.

Response to DPU Data Request 1.1

The Company received bids from five companies.

The Company executed the agreement with Electrify America in March 2023. Electrify America does intend to subcontract the following items, but have not executed agreements with specific subcontractors at this point in time:

- Survey
- Permitting services
- Engineering
- Site construction
- Commissioning

DPU Data Request 1.2

In reference to charger port configurations:

- (1) Does each charger have two 150 kilowatt (kW) ports, two 350 kW ports, or a combination of each?
- (2) Does each port have the capability for multiple connection technologies or are they configured for one technology type (i.e. J-1772, CCS, CHAdeMO).

Response to DPU Data Request 1.2

- (1) In the generic site location each direct current (DC) fast charger has its own port therefore there will be 2-150 kilowatt (kW) ports and 2-350 kW ports for a total of four. That is, four electric vehicles (EV) will be able to charge at the same time per location.

(2) No. The ports will be based on the Combined Charging System standard also known as CCS. Most car manufacturers that sell EV in North America utilize the CCS standard. The major exception is Tesla, which makes a proprietary charger. Earlier models of Tesla were capable of using the CHAdeMO plug with an adaptor. However, Tesla has stopped supporting the CHAdeMO adapter and instead offers a CCS adapter for its customers. Other manufacturers, such as Nissan whose early models used CHAdeMO, have switched to CCS. Since, there was a significant cost to provide multiple plugs and most EVs in Utah either utilize CCS or have the capability thru an adapter to use the CCS, it was determined to only provide CCS for the generic site.

DPU Data Request 1.3

In reference to Attachment B, Section 1a – Company Owned Charging Stations, Pre-Selection Site Evaluations, page 3, Panguitch was eliminated as a potential location due to system impacts of a megawatt (MW) load limitation. Does this mean Panguitch will have no EV charging infrastructure (Company owned or 3rd Party)? Please elaborate.

Response to DPU Data Request 1.3

In preliminary analysis, it was estimated that to add 1 megawatt (MW) of new load in the Panguitch area would necessitate significant investment in system upgrades. This type of system upgrade is outside of the scope of the electric vehicle infrastructure program (EVIP). In terms of charging in the area, the EVIP generic site (with a MW of charging capacity) will not be deployed in the initial phases. If the area's system is upgraded, then the Company will revisit deploying infrastructure. The Company does not know what third party charging station companies intend to do in the region.

DPU Data Request 1.4

In reference to Table 1 – List of Locations Planned and Installed with Charger Type, page 4, 11 of the 20 planned charging locations are along the Wasatch Front.

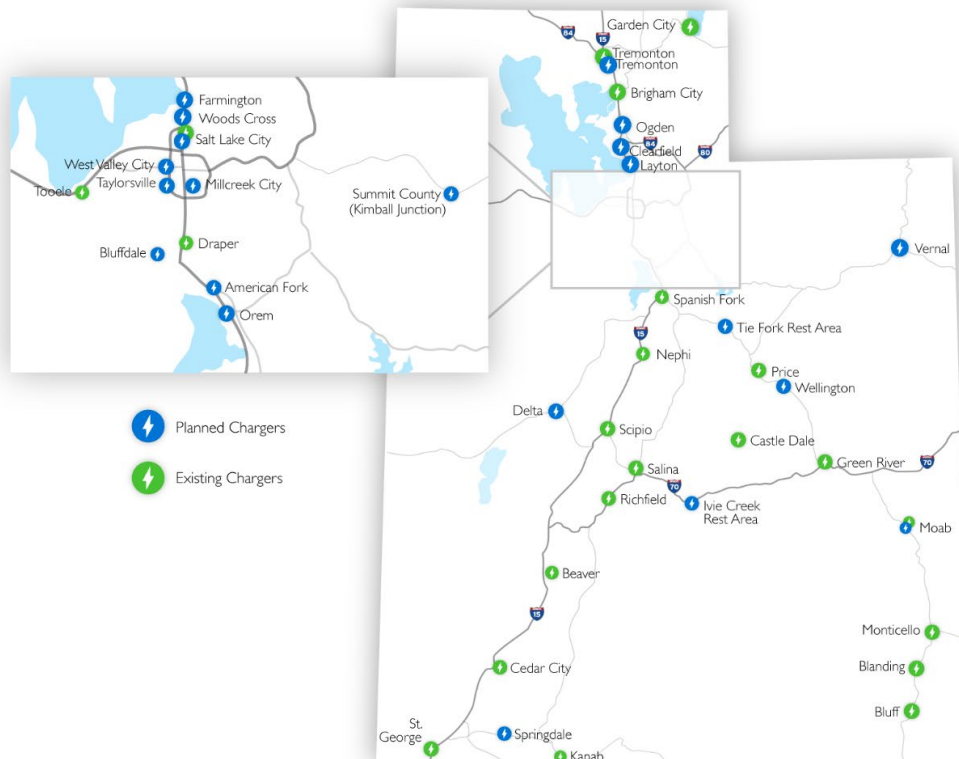
(1) Please provide a forecast of the anticipated revenues from all 20 planned locations in Excel format with intact formulae.

(2) Please provide a map of the planned locations.

Response to DPU Data Request 1.4

(1) Please refer to Attachment DPU 1.4.

(2) Please refer to the map provided below:



DPU Data Request 1.5

Please provide a breakdown of the residential and non-residential Make Ready Rebates and Charger Rebates summaries in Excel format with intact formulae.

Response to DPU Data Request 1.5

Please refer to Attachment DPU 1.5.

DPU Data Request 1.6

In reference to Section 1c – Partnerships, Department of Energy Grants, page 12, RMP indicates that no EVIP funds were spent on partnerships or innovative projects. However, Section 1d – Educational Outreach/Marketing, Sponsored Event, page 20, indicates that RMP leveraged WestSmartEV@Scale funding:

(1) Please clarify these two statements.

(2) Please explain how there were numerous reporting of Outreach activities over the reporting period but no record of Marketing or Partnership related expenses on RMP Attachment A – EVIP Accounting (Excel) 4-3-2023.

Response to DPU Data Request 1.6

(1) For Section 1c (Partnerships, Department of Energy Grants) on page 12, no funds that were collected from Schedule 198 were used in partnerships or innovative projects. In Section 1d (Educational Outreach/Marketing, Sponsored Event) on page 20, a sponsored event (National Drive Electric Event) was highlighted. During that event, the Company provided outreach and education related to the electric vehicle infrastructure program (EVIP) including outreach on program incentives, future Company owned chargers, and educational materials for the time-of-use (TOU) program. The Company was able to leverage the WestSmartEV@Scale project for that public event and did not use funds collected from Schedule 198.

(2) There were multiple outreach activities that resulted in the expenditure of funds from Schedule 198 during 2022. The outreach activities themselves occurred in 2022 and were included in the 2022 report. However, by the time the invoices associated with the activities were processed and paid, the payments occurred in January 2023, and were booked in the balancing account for January 2023. As a result, the expenditures did not appear in the 2022 annual report, but will be included in the 2023 report.

DPU Data Request 1.7

In reference to RMP Attachment A – EVIP Accounting (Excel) 4-3-2023, Cell N33, \$393,246, Infrastructure Capital Spend, please provide a breakdown of this charge in Excel Format with intact formulae.

Response to DPU Data Request 1.7

Please refer to Attachment DPU 1.7. The Company notes that in preparing this response it found \$10,798.84 in allowance for funds used during construction (ADIT) was erroneously applied to this project and should be removed. The Company will update Attachment A (EVIP Accounting) with its reply comments in this proceeding.

DPU Data Request 1.8

In reference to RMP Attachment A – EVIP Accounting (Excel) 4-3-2023, Carrying Charge, please provide the calculation of the 8.99 percent rate used to calculate the carrying charge in Excel format with intact formulae.

Response to DPU Data Request 1.8

The carrying charge shown on row 43 of the referenced file “RMP Attachment A – EVIP accounting (Excel) 4-3-2023” provides the formulas showing how the carrying charge was calculated.

DPU Data Request 1.9

In reference to Appendix 1, Request for Proposal, please explain in detail the performance metrics the providers will be required to report back to RMP and frequency of those reports.

Response to DPU Data Request 1.9

The providers will be required to report back to the Company via dashboard access the following operational and performance data:

- Current status by dispenser including availability and power rating;
- Asset cases (tickets): open and historical;
- Work orders: open and historical;
- Historical daily and monthly summary charging data by dispenser, including availability, utilization, session count, energy (kilowatt-hour (kWh)) delivered, charge success rate: and
- Anonymized charging session data including, power level (kilowatt (kW)), start and end timestamps, duration, kWh delivered, payment amount and method, and charging dispenser details.

This data will support network performance management and customer experience.

DPU Data Request 1.10

In reference to Attachment B, Section 1a – Company Owned Charging Stations, Section 1b – Make Ready Infrastructure and Rebate Incentives, Make Ready Incentives, page 7, RMP states that incentives can cover infrastructure on both the utility side and customer side of the meter. Please explain in detail how the accounting for the incentive would flow through the cost of capital calculation for those costs incurred on the utility side of the meter.

Response to DPU Data Request 1.10

Capital expenses for the electric vehicle infrastructure program (EVIP), including any capital expenditures for infrastructure on the utility side of the meter, are funded with the revenues collected to fund the program through Electric Service Schedule No. 198. Therefore the impact to the Company's rate base is zero and the costs do not impact the cost of capital calculation.

DPU Data Request 2.1

In reference to RMP Attachment A – EVIP Accounting (Excel) 4-3-2023, Make Ready Infrastructure Expenses, please explain why the \$106,744 of non-residential and residential rebates paid out as illustrated in Attachment B, page 9, are not included in Attachment A.

Response to DPU Data Request 2.1

The \$106,744 expenditure for non-residential and residential rebates paid out are located in "RMP Attachment A – EVIP Accounting (Excel) 4-3-2023" in row 19 with the total for the year in cell O19.

Docket No. 24-035-17

DPU Data Request 1.1

In reference to Attachment A, please provide the EVIP Accounting in Excel format with intact formulae and continue to provide the attachment separately in Excel format with intact formulae in future reports.

Response to DPU Data Request 1.1

The Company assumes that the reference to "Attachment A" is intended to be a reference to Rocky Mountain Power's (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP)

555 annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP
556 Accounting). Based on the foregoing assumption, the Company responds as follows:

557 Please refer to Attachment DPU 1.3.

558 **DPU Data Request 1.2**

559 In reference to Attachment A, please explain the variance between the \$5,905,778 collected
560 through Schedule No. 198 during 2023 to the \$5,000,000 allowed in the Stipulation under
561 paragraph 32.

562 **Response to DPU Data Request 1.2**

563 The Company assumes that the reference to "Attachment A" is intended to be a reference
564 to Rocky Mountain Power's (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP)
565 annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP
566 Accounting). Based on the foregoing assumption, the Company responds as follows:

567 The Schedule 198 rate was designed to collect about \$5 million annually based on the sales
568 and revenues from the forecast period 12 months ending December 2021 established in the
569 Company's last general rate case (GRC), Docket 20-035-04. The actual annual collection
570 may be more or less than the \$5 million amount depending on the actual annual sales and
571 revenues.

572 **DPU Data Request 1.3**

573 In reference to Attachment A, please provide a breakdown in Excel format with intact
574 formulae, for the \$4,927,085 expenditure for RMP Chargers under Capital Spend.

575 **Response to DPU Data Request 1.3**

576 The Company assumes that the reference to "Attachment A" is intended to be a reference
577 to Rocky Mountain Power's (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP)
578 annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP
579 Accounting). Based on the foregoing assumption, the Company responds as follows:

580 Please refer to Confidential Attachment DPU 1.3.

581 Confidential information is provided subject to Public Service Commission of Utah (UPSC)
582 Rules R746-1-601–606.

583 **DPU Data Request 1.4**

584 In reference to Attachment A, please provide an explanation for the \$703,564 Warranty
585 expense under RMP Chargers.

586 **Response to DPU Data Request 1.4**

587 The Company assumes that the reference to “Attachment A” is intended to be a reference
588 to Rocky Mountain Power’s (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP)
589 annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP
590 Accounting). Based on the foregoing assumption, the Company responds as follows:

591 The \$703,564 warranty expense is for a two-year extended warranty on the dispensers. The
592 original purchase had a product warranty that was built into the purchase price. The original
593 warranty is booked as capital, whereas an extended warranty is booked as an expense.

594 **DPU Data Request 1.5**

595 The Stipulation signed by the parties in Docket No. 20-035-34, November 17, 2021,
596 specifically Paragraph 33 Budget and Expenditures, Section (a), “capital expenditures,
597 which will be allocated as follows”, please explain how the Attachment A CY 2023 Totals
598 conform to the 45 percent Company-owned chargers, 45 percent make-ready investments,
599 and 10 percent innovative projects and partnerships.

600 **Response to DPU Data Request 1.5**

601 The Company assumes that the reference to “Attachment A” is intended to be a reference
602 to Rocky Mountain Power’s (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP)
603 annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP
604 Accounting). Based on the foregoing assumption, the Company responds as follows:

605 RMP’s 2023 EVIP annual report contains the amounts that have been booked and paid for;
606 Company-owned chargers, make-ready investments and innovative projects. The process
607 for make-ready projects is for the requestor to apply for funding through an application, then

the Company selects and awards the project. The awardee then completes the project and payment is made after the project is completed and verified. The payment is then booked and included in RMP's 2023 EVIP annual report, Attachment A (EVIP Accounting). Since many projects are taking significant amounts of time to complete, there is a significant lag between a project being awarded and the project being completed. Once the Company awards the project, the funds are "reserved" even if they are not booked. A better measure to assess if the program is conforming to the ratio's agreed upon in the November 17, 2021 Settlement Stipulation executed by the parties in Docket No. 20-035-34, is to compare the amounts awarded. The awarded amounts for the make-ready projects are listed in Attachment B of RMP's 2023 EVIP annual report. Please refer to the table below which lists the funds for Company-owned chargers, make-ready awards and innovation projects:

Company Owned vs Make Ready Awards						
Category	2022	%	2023	%	Total	%
Company Owned	\$ 393,246	14%	\$5,405,921	56%	\$ 5,799,167	47%
Make Ready Awards	\$2,373,725	86%	\$4,269,810	44%	\$ 6,643,535	53%
Innovation	\$ -	0%	\$ -	0%	\$ -	0%
Total	\$2,766,971		\$9,675,731		\$ 12,442,702	

The Company notes that paragraph 33 of the November 17, 2021 Settlement Stipulation states the ratios are approximate and that "These allocations will be monitored through the Program Review discussed in paragraph 41 below; however, on an annual basis, the Company will have flexibility to make expenditures as necessary, and confirmation that the expenditures are consistent with the percentages described above will be assessed in the Program Review proceedings." Based on the ratios above, the Company believes that the program is on track with the November 17, 2021 Settlement Stipulation.

DPU Data Request 1.6

In reference to Section 1a, please provide further detail how the new equipment design will distinguish the 350kW between the two ports, when for example an EV is already charging at 350 kW and another pulls in to charge.

(1) Will the charger adjust accordingly between the two EVs.

(2) Will the charger alert the EV owner of the change.

(3) Will the charger adjust the rate?

Response to DPU Data Request 1.6

The Company assumes that the reference to “Section 1a” is intended to be a reference to Rocky Mountain Power’s (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP) annual report filed in this proceeding on April 1, 2024, specifically Attachment B, Section 1a (Company Owned Charging Stations). Based on the foregoing assumption, the Company responds as follows:

It is important to note that electric vehicle (EV) charging rates are controlled by the vehicle which is done to protect the vehicle’s battery system. Vehicle models charge at different rates with some vehicles charging as low as 50 kilowatts (kW) and as high as 350 kW; with most current vehicles charging in the 100 kW range. By having power sharing, it allows for the flexibility of accommodating vehicles with different charging rates at the same time.

(1) Yes. The charger will adjust accordingly between the two EVs. The chargers will supply the maximum amount of charging rate requested by the vehicle up to the combined output of 350 kW. If one vehicle is requesting 100 kW then the other vehicle can receive up to 250 kW, if it is requested. If both vehicles are requesting over 175 kW, then the chargers will only provide 175 kW each.

(2) The EV owner will have access to real-time charger rates on the charger and on their App, but alerts will not be sent when changes occur. Many times the charging rate is altered by the vehicle based on the battery condition.

(3) Yes. The charger will adjust the rate depending on how many kW the vehicle is “requesting”.

1st Revised Response to DPU Data Request 1.1

Further to the Company’s response to DPU Data Request 1.1 dated April 10, 2024, the Company has become aware of an error within the response document. The Company’s response inadvertently referred to “Attachment DPU 1.3” instead of referring to “Attachment DPU 1.1”. The Company provides this 1st Revised response to correct that error. Note: other than correcting this error, the attachment provided with the Company’s original response (Attachment DPU 1.1) remains valid and unchanged.

The Company assumes that the reference to “Attachment A” is intended to be a reference to Rocky Mountain Power’s (RMP) 2023 Electric Vehicle Infrastructure Program (EVIP) annual report filed in this proceeding on April 1, 2024, specifically Attachment A (EVIP Accounting). Based on the foregoing assumption, the Company responds as follows: Please refer to Attachment DPU 1.1.

Docket No. 25-035-23

DPU Data Request 1.1

In reference to RMP’s filing, page 1, paragraph two, RMP claims that its EVIP report contains two confidential appendices and six non-confidential appendices. At page 22, the report indicates that “Appendixes 1 and 2 are confidential in their entirety and are provided under separate cover.” Only Appendix 1 was provided in RMP’s filing. Please provide Appendix 2.

Response to DPU Data Request 1.1

Please refer to Confidential Attachment DPU 1.1.

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601–606.

DPU Data Request 1.2

Please provide Attachment A, EVIP Accounting (calendar year 2024), in excel format with intact formula per the Commission’s Acknowledgement letter dated May 30, 2024.

Response to DPU Data Request 1.2

Please refer to Attachment DPU 1.2.

DPU Data Request 1.3

In reference to Attachment A, please explain why the Ending Balance shown in the upper-left hand corner of Attachment A is \$3,958,412.64 versus the Total Balancing Account of \$3,934,271.45 shown in the lower-right under CY 2024 Total column of Attachment A.

Response to DPU Data Request 1.3

Please refer to Attachment DPU 1.3.

689 **DPU Data Request 1.4**

690 In reference to Section 1a, Table 3, page 4,

691 (1) Please explain the difference between the 67% of the \$154,703 (\$103,651),
692 compared to the \$62,009.79 reported for Schedule 60 on Attachment A.693 (2) Please explain why Attachment A illustrates that \$30,542.13 was deposited to the
694 EBA while the 33% value from Table 3 illustrates \$51,051.99 (difference between
695 the allocated 67% of Schedule 60 and 33% of EBA).696 (3) Please provide the accounting document that demonstrates the treatment of the
697 \$51,051.99 deposited to the EBA.698 **Response to DPU Data Request 1.4**

699 Please refer to Attachment DPU 1.4.

700 **DPU Data Request 1.5**701 In reference to Tables 5 and 6 on pages 7 and 8, Section 1b, Table 5 illustrates 538
702 chargers and 614 ports of Awarded AC Level 2 Charger Projects by Customer Category,
703 while Table 6 illustrates 565 chargers and 614 ports of Awarded AC Level 2 Charger
704 Projects by Location. Please explain this variance.705 **Response to DPU Data Request 1.5**706 Table 6 had the correct amounts, 565 chargers and 614 ports. The amounts in Table 5 were
707 the result of a clerical error. The corrected Table 5 is as follows:708 ***Corrected* Table 5. Awarded Projects by Customer Category, 2024**

Category	AC Level 2 Charger Count	AC Level 2 Port Count	DC Fast Charger Count	DC Fast Charger Port Count
Commercial	16	16	4	4
Dealership	34	42	6	11
Fleet	15	15	30	31
Lodging	18	18	4	4
Multi Family	288	301	4	4
Public	38	41	94	94
School	14	20	0	0
Transit	1	1	51	51
Workplace	141	160	4	4

Total	565	614	197	203
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709 Dual port charger counts were omitted from the following AC Level 2 charger count
710 categories:

711 Public charger count did not include two dual port chargers

712 School did not include 6 dual port chargers

713 Workplace did not include 19 dual port chargers

714 **DPU Data Request 1.6**

715 In reference to Attachment A, Marketing Expenses of \$26,152.98, and page 13 of Section
716 1d, claims that in 2024, the Company spent \$46,849 on marketing, outreach and education.
717 Please reconcile the difference in these numbers.

718 **Response to DPU Data Request 1.6**

719 In Attachment A, Marketing Expenses of \$26,152.98 represents what was paid in 2024 for
720 marketing, outreach, and education. The \$46,849 on page 13 section 1d represents
721 marketing outreach and education expenses that were incurred in 2024. The remaining
722 balance of \$20,696 was paid in 2025, the delay was related to when vendors submit
723 invoices and when the invoices are paid. Once the invoices are paid the amounts are
724 booked in the balancing account. Therefore, the remaining \$20,696 will appear in the 2025
725 report.

726 **DPU Data Request 1.7**

727 In reference to Table 7, Section 1e, page 15, RMP states that the Balancing Account only
728 reflects actual payments and actual revenue (Sch 198 and Sch 60) and does not include
729 commitments. RMP also states that it identifies funding commitments like Company-Owned
730 sites or customer Make-Ready incentives. Those funds are put to the side and considered
731 allocated even though they are not included in the Balancing Account. Please provide this
732 side account from inception of the EVIP program to the present including the \$33,657,087
733 illustrated in this year's report.

734 **Response to DPU Data Request 1.7**

735 Table 7 on page 15, Section 1e, Summary, refers to total funds that have been allocated to
736 date. The following table shows the breakdown by year:

Allocated Funds						
Category	2022	2023	2024	Total	%	% (w/make-ready only)
Company owned sites		\$6,263,676	\$8,895,467	\$15,159,143	45%	49%
Customer Incentive Awards						
AC Level 2	\$95,214	\$291,202	\$364,368	\$750,785		
DC Fast	\$429,710	\$1,215,075	\$186,593	\$1,831,378		
Make Ready	\$3,309,415	\$4,153,892	\$5,352,474	\$12,815,781		41%
Total incentives	\$3,834,339	\$5,660,170	\$5,903,435	\$15,397,944	46%	
Total Innovation Projects			\$3,100,000	\$3,100,000	9%	10%
Total	\$3,834,339	\$11,923,846	\$17,898,902	\$33,657,087	100%	
Total w/ Make Ready only				\$31,074,924		100%

737
738 The above table illustrates the tracking of allocated funds for 10 Company owned sites
739 either constructed or under construction, customer incentives including rebates and make
740 ready, and innovation projects along with their proportions to one another. For details,
741 please refer to Attachment DPU 1.7.

742 DPU Data Request 1.8

743 In reference to Section 1C, Partnerships, through its collaborative efforts with several
744 parties, three innovative projects were developed that will utilize EVIP funds (REVIVE
745 Project, SuperCharge Project, and Intelligent Integration Project). The REVIVE Project
746 allocates \$1M of EVIP funds, the SuperCharge Project allocates \$1M of EVIP funds, and
747 the Intelligent Integration Project utilizes \$2.1M of EVIP funds. Please provide an
748 accounting of these allocated funds along with those in data request question 1.7 above in
749 consideration of the \$50M allowed for the EVIP program since inception through the
750 forecast ten-year program period. If any of these allowed EVIP funds have been used,
751 please identify the accounts or categories in Attachment A that account for them.

Response to DPU Data Request 1.8

Of the three innovation projects developed in 2024, only SuperCharge and Intelligent Integration were allocated funds. The third project REVIVE was not allocated because the U.S. Department of Energy (DOE) paused the release of matching funds so the agency can review compliance with Executive Orders. The REVIVE project will not go forward without the DOE matching funds. If DOE releases the matching funds, then the project will be allocated. In 2024, no EVIP funds were spent so no expenditures were included in Attachment A. The expenditures are expected in 2025 and will be listed in that years report. In total, there has been \$33,657,087 funds allocated as outlined in data request response 1.7, of the \$50M allowed to be collected in Schedule 198. The \$3.1M for SuperCharge and Intelligent Integration projects are included in the table in Data Request Response 1.7.

Docket No. 20-035-34**DPU Data Request 6.1**

CONFIDENTIAL REQUEST - RMP's Schedule 60 includes charges for Level 2 charging at company operated charging stations. Confidential RMP Exhibit JAC-4 [REDACTED]

Response to DPU Data Request 6.1

There have been no Company-owned Level 2 charging as part of the Electric Vehicle Infrastructure Program (EVIP).

DPU Data Request 6.2

CONFIDENTIAL REQUEST - Confidential RMP Exhibit JAC-4 [REDACTED]

Response to DPU Data Request 6.2

Transaction fees are collected for and paid to credit card companies for credit card and App transactions. The fee is 2 percent of the transaction amount with a minimum charge of \$0.20 per transaction.

DPU Data Request 6.3

What information does the Company have to indicate that the idle charge is necessary? How often have all the chargers been full for an extended period of time with some chargers occupied by cars that have finished charging? How long, on average, after the charge is completed before the EV is disconnected?

Response to DPU Data Request 6.3

The Company's recommendation to include idling fees is based on the recommendation from its vendor, Electrify America, to apply an idling fee to encourage drivers to move their vehicles promptly so that others can use the chargers. Most large scale operators of direct current (DC) fast chargers (DCFC), including the two largest DCFC network operators in the country, Tesla and Electrify America, apply idling fees. The Company has not yet gathered usage and queuing data at its own sites to identify utilization and congestion patterns because it has limited operating data to date. The Company intends to conduct an analysis once additional sites have been installed and are operating for sufficient periods of time. The next program review period should represent a sufficient time period for a queuing and utilization analysis. This analysis would inform the review of idling fees and assist in determining whether to maintain the fee, alter the fee or implement a different type of site management like congestion fees. However, until more data is available the Company will rely on industry practice and recommendations from its vendor, who has years of experience managing over a 1,000 DCFC locations.

DPU Data Request 6.4

Were customers who were charged the idle charge because it was the Electrify America app's default to do so, notified in advance? If so, how?

Response to DPU Data Request 6.4

Users were notified with a text message that their charging session was complete and that they had a 10-minute grace period to move their car and that after that grace period the user would be charged \$0.40/minute. The message was also

809 displayed on the charger screen.

810 **DPU Data Request 6.5**

811 How will charging customers be warned about the idle charge?

812 **Response to DPU Data Request 6.5**

813 Users will be warned of a potential charge through text messages to their phone
814 and display messages on the charger screen.

815 **DPU Data Request 6.6**

816 When will charging customers be warned about the idle charge?

817 **Response to DPU Data Request 6.6**

818 Users are notified at the beginning of the session that they will incur idling fees if
819 they do not move the vehicle when the session is completed. Once the session is
820 completed another notification is sent to the user warning them that the 10-minute
821 grace period has begun.

822 **DPU Data Request 6.7**

823 Innovative Partnerships are described in the Direct Testimony of Joseph A.
824 Campbell, pages 11-14, where he explains that the REVIVE partnership is
825 pending federal funding but the other two partnerships are actively being
826 developed. Are active innovative partnerships expected to produce deployable
827 products? If not, which partnership does RMP expect to remain unfinished or
828 unusable and which partnership will be in service after the allocated funds have
829 been exhausted?

830 **Response to DPU Data Request 6.7**

831 The Company assumes the reference to the "Direct Testimony of Joseph A.
832 Campbell" was intended to be a reference to the Direct Testimony of Company
833 witness, James A. Campbell. With the foregoing assumption, the Company
834 responds as follows:

835 Both active innovative partnership projects are expected to produce deployable

836 products as part of the projects.

837 **DPU Data Request 7.1**

838 [REDACTED]

839 [REDACTED]

840 [REDACTED]

841 [REDACTED]

842 **Response to DPU Data Request 7.1**

843 [REDACTED]

844 [REDACTED]

845 [REDACTED]

846 **DPU Data Request 7.2**

847 [REDACTED]

848 [REDACTED]

849 [REDACTED]

850 [REDACTED]

851 **Response to DPU Data Request 7.2**

852 [REDACTED]

853 [REDACTED]

854 [REDACTED]

855 [REDACTED]

856 [REDACTED]

857 [REDACTED]

858 [REDACTED]

859 [REDACTED]

860 [REDACTED]

861 [REDACTED]

862 [REDACTED]

863 [REDACTED]
864 [REDACTED]
865 [REDACTED]
866 [REDACTED]
867 [REDACTED]

868 **DPU Data Request 7.3**

869 [REDACTED]
870 [REDACTED]
871 [REDACTED]

872 **Response to DPU Data Request 7.3**

873 [REDACTED]
874 [REDACTED]
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876 [REDACTED]
877 [REDACTED]
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879 [REDACTED]
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881 [REDACTED]
882 [REDACTED]
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885 [REDACTED]

886 **DPU Data Request 7.4**

887 [REDACTED]
888 [REDACTED]
889 [REDACTED]

890 **Response to DPU Data Request 7.4**

891 **Revenue**

892 [REDACTED]
893 [REDACTED]
894 [REDACTED]
895 [REDACTED]
896 [REDACTED]
897 [REDACTED]
898 [REDACTED]
899 [REDACTED]
900 [REDACTED]

901 **Expenses**

902 [REDACTED]
903 [REDACTED]
904 [REDACTED]
905 [REDACTED]
906 [REDACTED]
907 [REDACTED]
908 [REDACTED]
909 [REDACTED]
910 [REDACTED]
911 [REDACTED]
912 [REDACTED]
913 [REDACTED]
914 [REDACTED]
915 [REDACTED]
916 [REDACTED]
917 [REDACTED]
918 [REDACTED]
919 [REDACTED]
920 [REDACTED]

921 [REDACTED]
922 [REDACTED]
923 **Capital Spend (Company-owned)**
924 [REDACTED]
925 [REDACTED]
926 [REDACTED]
927 [REDACTED]
928 [REDACTED]
929 [REDACTED]
930 [REDACTED]
931 [REDACTED]
932 [REDACTED]
933 [REDACTED]
934 [REDACTED]
935