

May 3, 2023

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

**RE: Docket No. 23-035-18  
Annual Report of Rocky Mountain Power’s Electric Vehicle Infrastructure Program  
Comments of Western Resource Advocates and Utah Clean Energy**

### Introduction

Western Resource Advocates (“WRA”) and Utah Clean Energy (“UCE”) submit these comments in response to the April 2023 Annual Report of Rocky Mountain Power’s Electrical Vehicle Infrastructure Program (“EVIP”). Our comments propose modifications to the residential rebate conditions, offer recommendations on various aspects of the Company-owned charging stations, including site design, customer use, and charging station locations, suggest coordination with the Company’s demand response measures, and propose increased detail in the Company’s reporting.

### Residential Rebates

In its semi-annual report, the Company notes that over 50% of residential rebate applications have been rejected.<sup>1</sup> The report goes on to state that the primary reason for this high rate of rejection is due to customers requesting rebates for Tesla chargers, which do not meet the open standards and interoperability requirements. While WRA recognizes the importance of open standards and interoperability for public chargers receiving ratepayer funding, these requirements should not extend to residential customers seeking rebates for installing chargers at their own homes. Given that the purpose of home charging is to allow EV drivers to charge their EVs at home, residential customers should be able to qualify for rebates when purchasing chargers suited to charging their own vehicles, such as Tesla owners buying Tesla chargers. Unlike public chargers, where interoperability is key to ensure that chargers supported by utility investment can be accessed by all EV drivers, at home charging will likely only be used by the homeowner, and thus it is not necessary to ensure interoperability in this case. Any at-home Level 2 charging that the customer uses can provide overall system benefits to the grid, so long as they are charging off-peak. For these reasons, the design of the residential rebate program ought to be inclusive of EVs from all automakers in order to maximize the number of customers receiving rebates. This will increase the amount of home charging available to RMP customers, as well as increase enrollment in the EV TOU rate.

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<sup>1</sup> EVIP annual report, page 8.

## Company-owned Charging Stations

We have a few concerns and comments on the site design of Company-owned chargers, its procedures for ensuring customers can access the lower rates for Company customers, and the locations the Company has selected.

### Site Design

Given that each Company-owned site will include two 150-kW chargers and two 350-kW chargers, it is important the Company maximize the usefulness of that infrastructure for the full range of vehicles such infrastructure could serve. Given the high-power levels of the DC fast chargers (DCFC) the Company will be installing, we recommend that the site design accommodates medium- and heavy-duty vehicles. We recommend that the Company make the two 350-KW chargers accessible to larger vehicles. The current site profile presented in Figure 1 of the EVIP annual report does not accommodate such uses and so we suggest amending it accordingly to include wider spaces. This modification could increase the utilization of Company-owned charging station and decrease the need for duplicative infrastructure.

### Charging Rate Differentiation for Company Customers

With the approved rate differentiation for Company customers allowing them access to lower rates, we recommend that the Company take a proactive and robust approach to ensuring customers are aware of this benefit. All customers receiving residential rebates or taking service on Schedule 2E should also receive radio frequency identification (RFID) cards or similar technology that allows access to lower rates at Company owned charging stations. Additionally, the Company should engage in outreach to all its customers to inform them of this benefit and create an easy, accessible manner to sign up to receive the benefit of lower charging rates at its stations.

### Charging Station Locations

The Company's tentative list of charging stations, displayed in Table 1 of the EVIP annual report and reproduced below, concentrates the majority of charging locations along the Northern Wasatch Front, and most of those appear to be on the east side of the I-15 corridor. The Company stated in its EVIP application that it would "focus the charging station deployment at locations that contribute to completing gaps throughout the state and locations that support increased access and capacity for high-volume users, such as fleets and vehicles without charging at their residence, which can provide revenue to offset program costs."<sup>2</sup> Since communities West of the I-15 corridor have lower household incomes and greater density of multi-family housing where people are less likely to be able to charge their vehicles at home, we recommend that the Company take this into consideration and include charging station deployment in more Westside communities to ensure equitable access to charging. The proposed site locations appear to provide charging infrastructure throughout most of the state, but there is not enough information to know whether the locations are targeted to provide equitable access to charging for customers without at-home charging.

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<sup>2</sup> Docket No. 20-035-34, Exhibit RMP\_\_\_\_(JAC-1) Page 13 of 30.

**Table 1. List of Locations Planned and Installed with Charger Type**

Location	Planned or Installed	Type	# of Ports
Tremonton	Planned	DCFC:2-350KW 2-150KW	4
Ogden	Planned	DCFC:2-350KW 2-150KW	4
Layton	Planned	DCFC:2-350KW 2-150KW	4
Farmington	Planned	DCFC:2-350KW 2-150KW	4
Woods Cross	Planned	DCFC:2-350KW 2-150KW	4
Salt Lake City	Planned	DCFC:2-350KW 2-150KW	4
Millcreek City	Planned	DCFC:2-350KW 2-150KW	4
West Valley City	Planned	DCFC:2-350KW 2-150KW	4
Taylorsville	Planned	DCFC:2-350KW 2-150KW	4
Draper	Planned	DCFC:2-350KW 2-150KW	4
American Fork	Planned	DCFC:2-350KW 2-150KW	4
Orem	Planned	DCFC:2-350KW 2-150KW	4
Summit County	Planned	DCFC:2-350KW 2-150KW	4
Vernal	Planned	DCFC:2-350KW 2-150KW	4
Delta	Planned	DCFC:2-350KW 2-150KW	4
Tie Fork Rest Area	Planned	DCFC:2-350KW 2-150KW	4
Wellington	Planned	DCFC:2-350KW 2-150KW	4
Ivie Creek Rest Area	Planned	DCFC:2-350KW 2-150KW	4
Moab	Planned	DCFC:2-350KW 2-150KW	4
Springdale	Planned	DCFC:2-350KW 2-150KW	4

### Demand Response Coordination

Regarding Company-owned charging stations, the proposal notes that the “network shall provide energy management tools.”<sup>3</sup> Demand response is an important part of planning our electric vehicle infrastructure for the future by balancing the grid. We recommend that the Company explicitly address these demand response capabilities in their planning and that this should be coordinated with the Company’s Demand Side Management (DSM) Steering Committee.

### Data Collection and Reporting on Non-Residential Rebates and Make-Ready Categories

The report did not specifically address the types of locations where make-ready incentives and rebates supplied funding to deploy charging infrastructure. Going forward, we recommend that the Company include data detailing the types of locations where customers applied for and received Company awards for charging infrastructure. This type of data will provide useful insight and help to determine if modifications to the EVIP need to be made in the future to make the EVIP serves customers seeking to access the charging station and make-ready incentives for different types of properties, such as multi-family housing. The categories we would like the

<sup>3</sup> EVIP Annual Report, Appendix 1, page 9.

Company to report on include multi-family housing, business, workplace, fleet, public charging, and other use cases.

Sincerely,

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**Certificate of Service**  
**Docket No. 23-035-10**

I hereby certify that a true and correct copy of the foregoing was served by email on May 03, 2023, on the following:

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