May 18, 2023

Utah Public Service Commission
Heber M. Wells Building, 4th 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
Reply Comments of Western Resource Advocates

WRA submits these reply comments addressing topics discussed in the initial comments of ChargePoint and the Division of Public Utilities.

Response to ChargePoint

ChargePoint's comments recommend that the Commission direct the Company not to seek any NEVI funding available in Utah under IIJA with respect to the 20-25 DCFC locations that the Company will own.[1] We disagree with this directive and the reasoning ChargePoint provided for recommending it. ChargePoint's reasoning for their recommendation is that RMP utilizing NEVI funds would likely lead to fewer DCFCs deployed in Utah over the next few years than if RMP did not seek NEVI funds. However, given that the Company is investing in "locations that contribute to completing gaps throughout the state" it is possible that the private market would not build charging stations at those locations, even considering NEVI funds, resulting in the Company increasing the charging availability in Utah.[2] Disallowing the Company from even applying for NEVI funds precludes the possibility of such charging stations being built in the most cost-effective manner. A possible outcome under ChargePoint's recommendation would be the Company building charging on an alternative fuel corridor which meets NEVI guidelines, despite having not applied for NEVI funds. This would needlessly raise the cost of the project to Company ratepayers.

Additionally, the combination of NEVI and Company funds may allow RMP to deploy an increased number of charging stations from EVIP funding or allow them to shift unused funds to other programs, such as make-ready. ChargePoint's assumption that the Company will be able to build 25 charging stations regardless ignores that the high costs of constructing stations in remote locations may exceed the Company's budget and mean they do not build an additional five charging stations. As such, utilization of NEVI funds may allow the Company to construct additional charging stations beyond the currently planned 20 stations.

[1] ChargePoint Comments, page 4.
[2] Docket No. 20-035-34, Exhibit RMP___(JAC-1), page 13.

ChargePoint also ignores the benefit of using federal funds to lower the cost per charging station borne by Company ratepayers. Lowering the cost of these projects could result in additional EVIP funding being available for other charging infrastructure, such as make-ready programs or rebates, increasing the overall amount of charging EVIP supports.

To add further context to the use of federal funding in deploying utility-owned charging stations, public utilities commissions in multiple states have found utility investment in charging stations coupled with NEVI funding to be prudent. The Public Utilities Commission of Nevada approved NV Energy's Interstate Corridor Charging Program this year, which authorizes NV Energy a budget of $22,664,181 to "support electric vehicle charging along major highways and interstates in Nevada" and explicitly permits NV Energy to seek NEVI funding to complement NV Energy's investments.[3] Another example of this is the Arizona Corporation Commission's approval of Tucson Electric Power's corridor charging program budget, which approves spending of "up to $50,000 per port (20 ports over three-years) to cover costs not included in the federal guidelines and or to be applied toward the local match requirement" for charging stations along alternative fuel corridors.[4] Given the arguments made above, we recommend that the Commission reject ChargePoint's proposal to disallow the Company from applying for NEVI funding.

Response to Division of Public Utilities Comments

We would like to support two recommendations raised by the Division in their comments. First, we support the Division's proposal to have the Company report on average uptime at Company-owned charging stations when that information becomes available. Uptime is a valuable metric that will show the extent to which Company-owned chargers are functional and this metric may inform parties' positions on the Company owning additional charging stations.

Additionally, we second the Division's recommendation for the Company to consider alternate charging station configurations for areas in which load capacity constraints exist. As detailed in the Division's comments, the exclusion of the possible charging station site in Panguitch illustrates how the high-load configuration the Company is deploying at all sites may leave certain communities lacking charging. Given the Company's emphasis on filling charging gaps throughout the state, we find that the Division's proposal will increase overall charging access.

Sincerely,

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[3] PUCN Docket No. 22-09006, Final Order, page 11.
[4] ACC Docket No. E-00000A-21-0104, Open Meeting Memorandum.

Certificate of Service
Docket No. 23-035-18

I hereby certify that a true and correct copy of the foregoing was served by email on May 18, 2023, on the following:

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*/s/ Sophie Hayes*_______