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# Office of Consumer Services

UTAH DEPARTMENT OF COMMERCE

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To: The Public Service Commission of Utah  
From: The Office of Consumer Services  
Michele Beck, Director  
Alex Ware, Utility Analyst

Date: May 2, 2024

Subject: Docket 24-035-17

**In the Matter of:** Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program

## INTRODUCTION

On April 1, 2024, Rocky Mountain Power (RMP or Company) filed with the Public Service Commission of Utah (PSC) its Annual Report of the Electric Vehicle Infrastructure Program (EVIP or Program). On April 2, 2024, the PSC issued a Notice of Filing and Comment Period establishing that interested parties may submit comments on RMP's filing on or before May 2, 2024 and reply comments on or before May 17, 2024. The Office of Consumer Services (OCS) provides the following comments pursuant to that schedule.

RMP submitted its EVIP annual report in accordance with the November 17, 2021 settlement stipulation and the June 15, 2022 PSC Order approving the proposed reporting requirements in Docket No. 20-035-34. The Company states the report includes Attachment A that provides the accounting information for EVIP activities in calendar year 2023 and Attachment B contains a written status update for each component of the Program.

## OCS REVIEW OF RMP'S EVIP ANNUAL REPORT

The OCS reviewed the report in its entirety with a focus on the reasonableness of the outcomes and explanations for the second programmatic year of the EVIP. Overall, the OCS notes that the Program is still in its buildout phase, with RMP reporting that four Company-owned charging stations are under construction and are expected to be operational in the second quarter of 2024. RMP also reports that three additional Company-owned charging stations are under engineering design and are expected to be

operational by the end of 2024. RMP states that it finalized the operator contract with Electrify America in 2023, which enabled them to move forward on charging station development and construction.

As Company-owned charging stations are not yet operational, there are no revenues to report in this Program area for 2023 under Schedule 60. RMP does report its authorized collections from ratepayers under Schedule 198 to fund the program, which is generally around \$5 million a year for 10 years – with a firm cap of \$50 million. The OCS believes that annual fluctuations above or below the \$5 million target are generally reasonable but we will be reviewing revenues annually with a focus on the firm \$50 million cap. We also commend RMP for seeking out additional funding for the EVIP through the National Electric Vehicle Infrastructure (NEVI) Funding program administered by the Utah Department of Transportation (UDOT). RMP states that it reviewed the 15 sites selected by UDOT and determined that eight matched the strategic objectives of the EVIP. Of the eight funding applications submitted by RMP to UDOT, seven were selected for a total of \$3.3 million for 38 additional charging ports. The funds will be issued after equipment installation and are expected to contribute to the on-going operation and maintenance costs for the sites. Overall, RMP reports 20 sites selected across Utah for Company-owned chargers for a total of 110 charging ports.

For the Make Ready Infrastructure and Rebate areas of the EVIP, RMP reports 2023 awarded funds by application type, application status, dollar amounts, charger type, number of ports, residential or non-residential designation, and awards by customer category and location. The OCS notes that these awards and rebates are spread across 32 different Utah cities. Residential customers are only eligible to apply for rebates and non-residential customers may apply for either Make Ready funds or rebates, but not both.

Also, regarding the Partnerships area of the EVIP for 2023, RMP reports that in 2023 the Governor appointed the Company to serve on a new electric transportation steering committee enacted through Senate Bill 125 – Transportation Infrastructure Amendments. No dollars were spent in this area in 2023.

Lastly, RMP reports that in 2023, its Educational Outreach and Marketing activities included a survey to gather customer perceptions and level of understanding of off-peak EV charging and time-of-use concepts. The OCS appreciates these efforts as they appear to reveal confusion among solar net-metering / export credit customers as to if they would qualify for an EV time-of-use program and lose their solar credits. The OCS believes that educating customers is critical to implementing the expansion of EV use in a manner that is consistent with the public interest and doesn't drive cost increases for other ratepayers. We remain very interested in working with RMP on issues of customer perceptions and charging behavior education and recommend that RMP continue its work on this issue and present more specific recommendations, including a plan for customer education, in the 2024 EVIP annual report.

## **RECOMMENDATIONS**

The OCS has reviewed RMP's 2023 EVIP annual report and associated appendices. We recommend that the PSC acknowledge that the annual report meets the requirements established for the EVIP program. We also recommend that RMP research the confusion concerning customer qualifications for solar compensation schedules and a potential EV time-of-use rate and include its findings and recommendations in the 2024 annual report.

cc:

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