

May 17, 2024

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administrator

**Re: Docket No. 24-035-17**  
Annual Report of Rocky Mountain Power’s Electrical Vehicle Infrastructure  
Program  
*RMP Reply Comments*

On April 1, 2024, PacifiCorp, doing business as Rocky Mountain Power (“the Company”), submitted its Electric Vehicle Infrastructure Program ("EVIP") Annual Report to the Public Service Commission of Utah (“Commission”). This submission was in accordance with the Settlement Stipulation dated November 17, 2021<sup>1</sup>, and the Commission Order approving the proposed report on June 15, 2022, in Docket No. 20-035-34. According to the Commission's Notice of Filing and Comment Period issued on April 2, 2024, the Division of Public Utilities (“Division”) and the Office of Consumer Services ("Office”) provided comments with recommended changes to the EVIP Report. In response to these recommendations, the Company submits reply comments.

**Response to Recommendations**

A. Division of Public Utilities

The Division states it has reviewed the information provided in the EVIP Report, including attachments A and B and concludes the Company’s EVIP is making progress towards the program goals, including developing charging infrastructure throughout Utah and educating the public about electric vehicles. The Division also reports on the Company’s partnership and grant efforts and states it looks forward to information on these efforts in the future. The Division’s comments also discuss how the information provided in the EVIP Report and discovery compares to the various parameters established in the Settlement Stipulation, highlighting two specific areas.

First the Division compares the expenditures in the EVIP Report for Company-owned charging, make-ready infrastructure and innovative projects and partnerships to the percentages established in paragraph 33 of the Settlement Stipulation, which states that the funds would be allocated 45% Company-owned chargers, 45% make-ready investment and 10% innovative projects and partnerships. Although the Division acknowledges that the Settlement Stipulation

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<sup>1</sup> Docket No. 20-035-34, Settlement Stipulation (Nov. 17, 2021).

provides the Company flexibility to make expenditures as necessary from year to year, it suggests that the Company may not be able to stay within the agreed upon ratios over the first 3 years of the program.

The Company believes that the EVIP is on track with the Settlement Stipulation and that the expenditures are consistent with the percentages listed above given the timing of applications for the make-ready program. The Company will continue to monitor the expenditures and agrees with the Division's suggestion that the percentages be re-evaluated in the upcoming Program Review.

The Division also notes that although the rates for Electric Service Schedule No 98 ("Schedule 98") were designed to collect \$5 million per year as established in in paragraph 32 of the Settlement Stipulation, the rates collected \$5.9 million in revenue in 2023. The Company agrees with Division that the total revenue collected can be reviewed as part of the Program Reviews and future rates can be adjusted accordingly as needed.

The Division concludes with a recommendation that the Commission acknowledge the Company's EVIP Report. For future EVIP Reports, the Division requests the Company provide:

1. Attachment A, EVIP Accounting in native Excel format with formulae intact;
2. An Excel workpaper showing the comparison of Company-owned chargers, make-ready investment and innovative projects and partnerships; and
3. The average time each charging port is available for customer use over the reporting period as data becomes available.

The Company agrees to provide this information as requested by the Divisions.

#### B. Office of Consumer Services

The Office recommends that the Commission acknowledge the EVIP Report as meeting the requirements. The Office reported that the EVIP is still in its buildout phase and that the Company-owned charging stations are under construction and not generating revenue under Electric Service Schedule No. 60 at this time. Similar to the Division, the Office also observed that the Company's collections to fund the EVIP under Schedule 198 were above the \$5 million annual target and stated that, although annual fluctuations are reasonable, they will be reviewed annually with a firm cap of \$50 million. The Company agrees with the Office's assessment.

The Office also expressed appreciation for the survey conducted by the Company as part of its Educational Outreach and Marketing efforts. The Office points to survey results that suggest confusion by customers with onsite generation and stresses that continued work on educating customers is critical to the implementation of the EVIP. The Office recommends the Company utilize the information learned in the survey to expand its efforts to include more specific recommendations, including a plan for customer education, in the 2024 EVIP annual report. The Company agrees and looks forward to working with the Office on ways to expand customer education and will include a plan in next year's report.

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### **RMP Recommendation**

The Company appreciates the Division and Office review and suggestions with regards to the EVIP. The Company requests that the Commission acknowledge the annual report as modified in these reply comments.

Sincerely,



Joelle Steward

Senior Vice President, Regulation

CC: Service List - Docket No. 24-035-17

**CERTIFICATE OF SERVICE**

Docket No. 24-035-17

I hereby certify that on May 17, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Michele Beck [mbeck@utah.gov](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

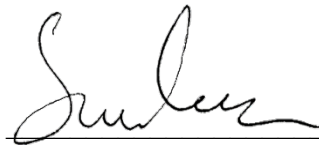
[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
Patrick Greco [pgreco@agutah.gov](mailto:pgreco@agutah.gov)

**Rocky Mountain Power**

Data Request Response Center [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)



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Santiago Gutierrez  
Coordinator, Regulatory Operations