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To: Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director

Alex Ware, Utility Analyst

Date: May 2, 2025

Subject: Docket No. 25-035-23

In the Matter of: Rocky Mountain Power's Electric Vehicle Infrastructure Program (EVIP) Report for Calendar Year 2024

INTRODUCTION

On April 1, 2025, Rocky Mountain Power (RMP or Company) filed with the Public Service Commission (PSC) its annual report of the Electric Vehicle Infrastructure Program (EVIP or Program) for calendar year 2024. On April 2, 2025, 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, 2025 and reply comments on or before May 19, 2025. The Office of Consumer Services (OCS) provides the following comments pursuant to that schedule.

OCS DISCUSSION OF RMP'S EVIP ANNUAL REPORT

The OCS reviewed the 2024 EVIP report in its entirety with a focus on the reasonableness of the outcomes and explanations for the third year of the program. Part A of the report presents the financial accounting of the Program's activities for the year. Part B of the report presents a descriptive view of specific activities the Program has accomplished over the past year and ongoing work.

Part A Financial Accounting Review

After review of Part A, the OCS views that the Program's revenue collection and spending is occurring at an accelerated rate compared to the original vision of the EVIP program. For example, while total annual collections under Schedule 198 to fund the



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Program are generally planned at \$5 million per year over 10 years, in 2024 collections totaled about \$6.6 million. As we stated in our comments for the 2023 EVIP report, we generally do not take issue with annual swings around the \$5 million target. However, collections of \$1.6 million over estimates begins to raise the question of where the reasonable threshold is. In addition, RMP's rate of spending under the EVIP program raises concern. Even though 2024 was only the third year of the EVIP program, the Company writes in "Section 1e – Summary" of its report that it has already allocated over \$33.5 million in funds (or over 2/3) out of the \$50 million over-10-years hard cap. We will continue to monitor overall Program spending with an eye on the \$50 million hard cap in every annual report.

New for the 2024 program year, RMP reports the opening and commencement of operations of four Company-owned charging stations. Therefore, the annual report for the first time includes vehicle charging sales data since June 2024 - as tracked under Schedule 60. This is a notable first step in the data collection that will be necessary to assess annual cost of service compared to annual revenue performance to determine if rate adjustments may be needed to make the Program self-funded. The OCS looks forward to those evaluations and discussions over the next few years. For 2024, total energy sales revenue was \$154,703 (revenue collected and applied to Schedule 60 in 2024 was about \$62,000 as the remainder spilled into 2025).

Lastly, for Part A of the report, the OCS reviewed DPU to RMP data request set 1 in this docket and notes it resulted in identifying a few minor data errors that need to be corrected. For example, RMP's response to DPU 1.5 corrects charger count errors in the annual report's Table 5. We recommend that RMP review DPU data request set 1 to ensure the necessary annual report corrections are filed in reply comments.

Part B – Programmatic Activity Description Review

RMP-Owned Charging Stations. As mentioned in the Part A section above, the most notable accomplishment of the overall Program for 2024 was the commencement of operations for four Company-owned charging stations. The locations of these first four stations are: Vernal, Moab, Millcreek, and Kimble Junction. RMP also reports six additional charging sites have been selected, are under development, and are expected to be operational this year in 2025. These site locations are: Ivie Creek, Layton, Ogden, Orem, Coalville, and Draper. Also, RMP reports in Table 1 of its report that 10 additional cities throughout Utah are in the queue for charging station site selection and development.

Across the four operational Company-owned charging stations, RMP reports the availability time or up-time for 22 charging port IDs. 91 percent of those charging points were up and active over 95 percent of the time. The lowest reported up-time was 90.65 percent. The OCS commends the operator Electrify America and RMP for these good results. We expect this will be a closely reviewed metric annually and encourage RMP to work to maintain excellent up-times. Also, RMP reports the load factors for the four new station locations with an average of only 10 percent. This means there is a lot of

room for changing load growth / electricity sales at these stations before the system becomes stressed. The OCS expects to see utilization growth over time and will be closely monitoring this metric in future cost of service evaluations – the first of which is due following year three of the Program.

Make-Ready Infrastructure and Rebate Incentives. RMP reported the outcomes of the Make-Ready Infrastructure and Charger Rebates activities of the EVIP program. These outcomes are reported in various useful ways such as: total incentive applications and awards by charger type, number of charging ports, customer category, and city location. The OCS notes that participation and spending in this area of the program appears reasonable and generally consistent with prior years.

Innovation and Partnerships. RMP reports it developed three new innovative projects that will utilize the EVIP funds allocated to this area of the Program. The OCS will not repeat every detail of these plans here, but general details are:

1. Reliable Electric Vehicle Infrastructure through Versatile and Equitable Managed Charging (REVIVE) project:
 - Partners: Utah State University, Utah Transit Authority, and the National Renewable Energy Laboratory (NREL)
 - Funding: conditionally selected for DOE award negotiation and \$1 million in EVIP funds
 - Purpose: Develop solutions that prioritize EV charging based on overall grid health (or managed charging) by studying EV charging demand times and customer preferences
2. SuperCharge project: Sustainable Utilization of Power Infrastructure Enabling Rapid and Replicable MHDV Charging (Medium and Heavy-Duty Vehicle)
 - Partner: ASPIRE Center at Utah State University
 - Funding: \$1 million in EVIP funds as a cost sharing requirement of a DOE award
 - Purpose: Develop utility integration of megawatt-scale charging with on-site battery storage to support local and regional freight movement. Includes field demonstrations at the Utah Inland Port
3. Intelligent Integration of Electric Vehicles and Buildings for a Campus with Innovative Cyber Security and Data Privacy Solutions (Intelligent Integration) project
 - Partners: Grid Elevated, the University of Utah, The Point Development
 - Funding: DOE award and currently unspecified EVIP funds to meet cost sharing requirements
 - Purpose: Develop architecture to control the integration of EV charging and distributed energy resources (DERs) and autonomous electric vehicles – with a focus on cyber security concerns

Educational Outreach and Marketing. RMP reports that in 2024 it conducted the following outreach activities:

- Promotional events associated with the grand opening of Company-owned charging stations including earned and paid media spots – with a focus on the importance of off-peak hour charging
- Media spots related to National Drive Electric Week with a focus on the importance of off-peak hour charging such as overnight
- EV car show and media sports with a focus on time-of-use charging
- STEM FEST at Mountain America Expo Center with a focus on off-peak hour charging

RMP also reports on its outreach and marking plans for the 2025 program year. These plans include:

- Promotional events for Company-owned charging station grand openings with a focus on discounts associated with off-peak charging for grid health and education around time-of-use charging rate schedules
- Continued efforts to study and develop solutions to obstacles preventing customer switching to EV class time-of-use rates – such as customers locked into solar net metering / export credit rate schedules. This includes a Company-track education effort at a cost of \$20,000 and a stakeholder-track education effort at a cost of \$20,000 – for a total of \$40,000. The stakeholder track will involve the OCS and the Governor's Office of Energy Development. The OCS reviewed Appendix 7 of the annual report that outlines the target audience, the key messaging issues, the timelines of the two tracks, and a list of development meetings and activities. Of note, the stakeholder track includes a discussion of creating an independent website from the voice of the stakeholders to provide additional authoritative sources to educate the public about the importance of off-peak hour charging and time-of-use rates, which appears to be a good addition to the outreach plan.

The OCS looks forward to collaborating in the development of EVIP outreach and education efforts as part of the stakeholder track.

RECOMMENDATIONS

Following our review of RMP's 2024 EVIP annual report, the OCS recommends that the PSC acknowledge the annual report as it generally complies with Program reporting requirements. However, we also recommend the PSC require RMP to do the following:

- Review its responses to DPU data request set 1 and file the identified needed report corrections during reply comments, such as the corrected Table 5 in the response to DPU 1.5.