ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W North Temple, Suite 330
Salt Lake City, Utah 84114

May 19, 2025

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

RE: **Docket No. 25-035-23** – Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program
Rocky Mountain Power's 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[1], 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, 2025, 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 recommends the Commission acknowledge the annual EVIP report as meeting the reporting requirements with the following recommendations:

1. RMP include the Excel version of Attachment A with the filings as previously agreed.
2. RMP file an Excel exhibit showing the annual revenues and expenses for the EVIP since inception. The exhibit should include the allocated incentives and make ready expenses for a complete picture of the EVIP status.

In the future, the Company will include the Excel version of Attachment A as previously agreed and apologizes for this oversight. Also, the Company has included Attachment 1 with these reply comments that provides the requested information on the program revenues and expenses since the inception of the EVIP.

[1] Docket No. 20-035-34, Settlement Stipulation (Nov. 17, 2021).

The Division also notes that rates for Electric Service Schedule No. 198 ("Schedule 198") were designed to collect \$5 million per year, the rates collected \$6.6 million. The Company will be filing the first Program Review in June and agrees with Division that the total revenue collected can be reviewed as part of the Program Review and future rates can be adjusted accordingly as needed.

The Division also compared the charging revenue collected under Electric Service Schedule No. 60 ("Schedule 60") reported in the EVIP annual report to the Schedule 60 charging revenue reported in the Company's May 1, 2025 energy balancing account ("EBA") filing and noted a difference in the numbers reported. The Company explained in discovery that the difference was due to the timing of when the funds were received, and the Division requested the Company use the same reporting period in order to facilitate an easier review. The Company agrees and will ensure the Schedule 60 revenues are consistently reported, or any differences explained, between the annual EVIP report and EBA filings.

The Division also discusses the difficulty in its ability to track make-ready infrastructure incentive projects year over year based on the Company's reporting. The Company will work on improving its reporting to make it easier to track incentives year-over-year as part of the Program Review. Attachment 1 includes a reconciliation of make-ready infrastructure incentive projects.

The Division expresses concern that the Allocated Funds reported on Table 7 report approximately \$33.7 million compared to the \$50 million overall funds, which the Division states is troubling since the EVIP is three years into a ten year program. The Division also states that as of December 2024, the EVIP is in a deficit of \$3.9 million. The Company responds that the \$33.7 million is not the amount that has been spent on the EVIP. This amount represents the Company's current plans to allocate funds between Company-owned chargers and incentive awards to ensure the 45%/45% split is accounted for. In total the Company has actually spent \$15.2 million since inception of the EVIP. Since the development of electric vehicle infrastructure projects requires long lead-time activities such as permitting, interconnection and property agreements, projects can take 1-2 years to construct. Therefore the \$33.7 million is simply a planned allocation of funding. So while the Division expresses concerns over the sustainability of the allocated funds presented in Table 7, the Company believes planning for the spending in this manner helps the Company manage the budget to ensure the EVIP does not make commitments that exceed its funding.

Also, the \$3.9 million ending balance referenced by the Division is not a deficit, but is the net of the revenues collected and the program expenditures. As of the end of 2024, the Company has collected \$3.9 million more than it has spent. Per statute[2] and the Settlement Stipulation[3], the Company is paying a carrying charge on these funds at its weighted average cost of capital ("WACC"), which is 8.99%. Due to the long lead times in developing EV infrastructure, the Company anticipates the spending will catch up in the next 1-2 years. However, to address the Division's concerns, the Company recognizes it is not authorized to collect more than the \$50 million through Schedule 198.

[2] 54-4-41(6).
[3] Settlement Stipulation paragraph 32.

Utah Code 54-4-41(2)(a) states that the Commission shall authorize a large-scale electric utility program that allows for funding from large-scale electric utility customers for a maximum of $50,000,000 for all costs and expenses associated with:

(i) the deployment of utility-owned vehicle charging infrastructure; and

(ii) utility vehicle charging service provided by the large-scale electric utility;

Although EVIP expenditures funded with Schedule 198 collections cannot exceed $50 million, Schedule 60 revenues and grant funding is not included in the $50 million cap since those sources are not "large-scale electric utility customers." Therefore the EVIP expenditures as a whole may exceed $50 million to the extent the Company is able to secure grant funds and Schedule 60 revenues. The budgets and plans for the remaining years of the EVIP will be part of the upcoming Program Review.

B. Office of Consumer Services

The Office recommends the Commission acknowledge the report as meeting the reporting requirements, but suggests the Company review responses provided in discovery for necessary updates. The Company reviewed the discovery and has included a corrected Table 5.

The amounts in Table 5 were the result of a clerical error. The corrected Table 5 is as follows:

***Corrected* Table 5. Awarded Projects by Customer Category, 2024**

Category	AC Level 2 Charger Count	AC Level 2 Port Count	DC Fast Charger Count	DC Fast Charger Port Count
Commercial	16	16	4	4
Dealership	34	42	6	11
Fleet	15	15	30	31
Lodging	18	18	4	4
Multi Family	288	301	4	4
Public	38	41	94	94
School	14	20	0	0
Transit	1	1	51	51
Workplace	141	160	4	4
Total	**565**	**614**	**197**	**203**

Informal inquiries on this matter may be directed to Max Backlund at (801) 220-3121.

Sincerely,

Jana Saba
Director, Regulation and Regulatory Operations

Enclosures

CC: Service List

CERTIFICATE OF SERVICE

Docket No. 25-035-23

I hereby certify that on May 19, 2025, 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
	ocs@utah.gov
Division of Public Utilities	
dpudatarequest@utah.gov	
Assistant Attorney General	
Patricia Schmid	pschmid@agutah.gov
Robert Moore	rmoore@agutah.gov
Patrick Grecu	pgrecu@agutah.gov
Rocky Mountain Power	
Data Request Response Center	datarequest@pacificorp.com
Jana Saba	jana.saba@pacificorp.com utahdockets@pacificorp.com
Max Backlund	max.backlund@pacificorp.com

Rick Loy

Rick Loy
Coordinator, Regulatory Operations