



Public Service Commission

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July 10, 2025

Mr. Max Backlund
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Re: *Docket No. 25-035-23 - Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program*

Dear Mr. Backlund:

The Public Service Commission (PSC) reviewed the Annual Report of Rocky Mountain Power's (RMP) Electric Vehicle Infrastructure Program (EVIP) filed on April 1, 2025 ("Report") in accordance with Utah Code § 54-4-41 and the PSC's Order in Docket No. 20-035-34 ("Reporting Requirements"). The PSC also reviewed the May 2, 2025, comments filed by the Division of Public Utilities (DPU) and the Office of Consumer Services (OCS), as well as reply comments filed by RMP on May 19, 2025.

DPU remains concerned about the revenue overcollection under Schedule Nos. 198 and 60. RMP collected \$6.7 million in 2024 under Schedule 198, designed to collect \$5 million annually over the course of 10 years. RMP attributes this to actual sales exceeding forecasts. DPU also comments that \$33.7 million has been allocated out of a \$50 million EVIP budget within the first three years of a ten-year program. This, combined with a 2024 EVIP balancing account deficit of \$3.9 million and ongoing annual expenses, raises concerns about the sustainability of current spending levels. DPU recommends improved transparency in accounting, consistent reporting periods, and reconciliation of awarded versus paid funds for make-ready incentives. DPU anticipates further development of the EVIP report as more data becomes available and RMP presents its first Program status report later in the year. DPU recommends that the PSC acknowledge the Report with DPU's recommendations for submission of certain additional or different data related to this report and in reports going forward.

The OCS finds the report is generally compliant but raises concerns about the accelerated revenue collection and spending. While annual revenue collection is planned at \$5 million, 2024 saw \$6.6 million. Additionally, RMP has already allocated over \$33.5 million of the \$50 million program cap within three years. OCS highlights the high uptime of four RMP-owned charging stations, but notes a low average load factor of 10%, indicating growth potential. OCS finds the participation and spending in Make-Ready Infrastructure and Rebate Incentives reasonable. OCS also acknowledges the three new innovative projects and RMP's educational outreach and marketing efforts. OCS recommends that the PSC acknowledge the Report as it generally complies with the Reporting Requirements and require RMP to file the identified needed report corrections.

In its May 19, 2025, reply comments, RMP has agreed to several reporting improvements and provided the requested exhibit and corrected tables. Regarding rates, RMP agrees that the \$6.6 million Schedule 198 revenue can be reviewed in the upcoming June Program Review, allowing for future rate adjustments. RMP clarified that the \$33.7 million in Table 7 is a planned allocation for future spending on company-owned chargers and incentive awards, not actual expenditures. RMP states that \$15.2 million has actually been spent since EVIP's inception, explaining that long lead times for infrastructure projects mean spending catches up over one to two years. RMP also clarified that the \$3.9 million ending balance is a surplus, representing more collected revenue than spent, on which it pays a carrying charge. RMP acknowledges the \$50 million collection cap through Schedule 198 but notes that Schedule 60 revenues and grant funding are not included in this cap, allowing for total EVIP expenditures to potentially exceed \$50 million. RMP indicates the budgets and plans for the remaining years will be in the upcoming Program Review.

Based on the PSC's review of the Report, DPU's and OCS's comments and recommendation, the PSC acknowledges that the Report as supplemented in RMP's May 19, 2025, reply comments complies with the Reporting Requirements. The PSC expects RMP to honor the good faith representations it made in its reply comments concerning the incorporation of additional or different data, as DPU recommended, in all subsequent reports.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#340609