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RE: UT Docket No. 26-035-19  
DPU 1<sup>st</sup> Set Data Request (1-7)

Please find enclosed Rocky Mountain Power's Responses to DPU 1<sup>st</sup> Set Data Requests 1.1-1.7.  
Also provided is Attachment DPU 1.4.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

           /s/             
Jana Saba  
Manager, Regulation

Enclosures

### **DPU Data Request 1.1**

Please explain why “Incentive Admin” costs are elevated relative to other line items in the Accounting Summary. What activities or cost drivers account for this level of expenditure?

### **Response to DPU Data Request 1.1**

“Incentive Admin” costs reflect incentive payments associated with completed Make Ready infrastructure projects and charger rebate projects that were pre-authorized prior to the January 1, 2025 expiration of Schedule 120 but completed and paid for during calendar year 2025. As shown in Attachment A and Attachment B of the 2025 Electric Vehicle Infrastructure Program (EVIP) Annual Report, while no new applications were accepted in 2025, a substantial number of previously authorized projects were completed, verified as operational, and paid for in that year.

Specifically, in 2025, the Company paid approximately \$2.7 million for Make Ready infrastructure, direct current fast charger (DCFC) rebates, AC Level 2 rebates and residential rebates, covering 66 paid applications across multiple customer categories and locations statewide. These payments represent direct incentive disbursements rather than administrative overhead. As a result, “Incentive Admin” appears elevated in the accounting summary relative to other expense categories, particularly given the wind-down of incentive offerings and the timing of project completions.

### **DPU Data Request 1.2**

The Accounting Summary reflects O&M expenses that exceed program revenues.

(a) Please explain why O&M costs are higher than revenues for the reporting period. (b) Please describe the relationship between sales volume (i.e., charging sessions or kWh delivered) and O&M costs. Are O&M costs primarily fixed, variable, or a combination?

### **Response to DPU Data Request 1.2**

(a) Operations and maintenance (O&M) expenses did not exceed program revenues for the reporting period. The Company considers O&M expenses to be non-capital expenses. Revenues of \$7,874,871 exceeded O&M expenses of \$7,241,731.

(b) O&M costs are primarily fixed in the near term. These costs include network service fees, maintenance contracts, warranty services, site upkeep, telecommunications, payment processing systems and customer support, which are largely insensitive to short-term changes in utilization or kilowatt-hours (kWh) delivered. Variable costs related to energy throughput are relatively small compared to the fixed costs associated with maintaining high charger availability and uptime. As utilization increases over time, the Company expects revenue growth to outpace incremental increases in O&M costs.

### **DPU Data Request 1.3**

Please define “OEM Bundles” as reflected in Appendix 2 and describe how this revenue or cost category arises. Are OEM Bundle arrangements expected to continue at their current level in future program years? If not, please describe any anticipated changes.

- (a) Please identify the service schedule(s) applicable to other high-voltage commercial EV charging stations not owned by Rocky Mountain Power.
- (b) Please provide the cost of service calculation for non-company-owned charging stations, including any differences in methodology from the calculation applicable to RMP-owned stations.

### **Response to DPU Data Request 1.3**

“OEM Bundles” refer to charging sessions or charging credits bundled with electric vehicle (EV) purchases by original equipment manufacturers (OEM) and redeemed by customers at Rocky Mountain Power (RMP) owned charging stations. Under these arrangements, charging activity may be paid for indirectly through OEM agreements rather than directly by the end user at the point of service.

The level of “OEM Bundle” activity varies by automaker program offerings and customer participation. These arrangements are subject to change as OEM marketing strategies evolve. Accordingly, the Company does not expect “OEM Bundle” volumes to remain at a constant level year over year and anticipates variability rather than a sustained fixed level of contribution to revenues.

- (a) RMP does not actively track the rate plan for all commercial EV charging stations within its Utah territory. The following rate plans are known to be associated with commercial EV charging stations; however, this list may not be comprehensive:

- [006A General Service Energy Time of Day Option.pdf](#)
- [006 General Service Distribution Voltage.pdf](#)
- [023 General Service Distribution Voltage Small Customer.pdf](#)

Customers may also be enrolled in a net metering/net billing rate in addition to their main service schedule.

- (b) RMP does not perform a separate or program-specific cost-of-service (COS) calculation for non-company-owned EV charging stations. Non Company-owned EV charging stations take service under the Company’s Public Service Commission of Utah (UPSC) approved commercial and industrial service schedules applicable to their voltage level and usage

characteristics, and rates are determined based on standard class COS methodologies approved in general rate cases (GRC).

In contrast, Company-owned EV charging stations deployed under the electric vehicle infrastructure program (EVIP) are accounted for through EVIP-specific balancing accounts and tariffs authorized by the UPSC. The cost recovery methodology for Company-owned EV charging stations includes capital investment, operations and maintenance (O&M) and network service costs associated with utility ownership and operation of public charging infrastructure, which differs from the standard retail service model applicable to non-Company-owned EV charging stations.

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DPU Data Request 1.4

### **DPU Data Request 1.4**

What percentage of Program costs are currently being recovered through rates versus other mechanisms? Which customer classes are bearing Program costs, and in what proportion?

### **Response to DPU Data Request 1.4**

The electric vehicle infrastructure program (EVIP) is primarily funded through Electric Service Schedule No. 198, which has been designed to collect \$50 million over 10 years consistent with Utah Code 54-4-41(2). Per the November 17, 2021, settlement stipulation in Docket No. 20-035-34, 67 percent of revenue received from January 1, 2018, through December 31, 2025, from charging at Company-owned electric vehicle (EV) charging stations (Electric Service Schedule No. 60) is deposited into the EVIP balancing account. Beginning January 1, 2026 through December 31, 2028, 35 percent of revenue received from Company-owned EV charging stations will be deposited into the EVIP per the terms of the settlement stipulation filed in Docket No. 20-035-34 on November 6, 2025. The final source of EVIP funding is any applicable carrying charges that accrue to the balancing account. No program costs are being recovered through customer rates beyond the collections of Schedule 198 and Schedule 60.

Please refer to Attachment DPU 1.4 which provides the percentages of Schedule 198 revenues by customer schedules for the period of 2022 through 2025. Schedule 60 is paid for by customers who charge at Company-owned EV chargers.

### **DPU Data Request 1.5**

What is the average cost per kWh delivered across the Program, and how does this compare to RMP's retail rates and to comparable third-party charging networks in Utah?

### **Response to DPU Data Request 1.5**

The average cost per kilowatt-hour (¢/kWh) delivered across the electric vehicle infrastructure program (EVIP) varies by location, charger type, utilization levels and the period a site has been in operation. Company owned direct current fast charging (DCFC) stations are higher ¢/kWh than standard retail electric service due to capital intensity, fixed operations and maintenance (O&M) costs and early stage utilization.

These costs are generally competitive with, and in many cases comparable to, third party DCFC networks operating in Utah, particularly in rural and corridor locations where utilization is lower. Retail electric rates are not directly comparable, as they do not include the costs of public charging infrastructure, network services, payment systems, or onsite amenities associated with DCFC.

The Company sampled several publicly available DCFC that were funded through EVIP. Of those whose prices could be confirmed, the prices varied from 58¢/kWh to 69¢/kWh, not inclusive of connection fees. This range includes several popular charging networks whose pricing information was easily searchable online.

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DPU Data Request 1.6

**DPU Data Request 1.6**

Does RMP intend to seek Commission approval for Program expansion, rate adjustments, or new cost recovery mechanisms in the next 12-24 months? If so, please describe.

**Response to DPU Data Request 1.6**

No. The Company does not anticipate seeking Public Service Commission of Utah (UPSC) approval for expansion or new cost recovery mechanisms of the electric vehicle infrastructure program (EVIP) in the next 12-24 months. At this time, the Company does not anticipate needing to propose any rate adjustments to the Schedule 198 surcharge in the next 12-24 months. However, the Company will continue to monitor the collections of the Electric Service Schedule No. 198 to ensure it does not collect more than \$50 million authorized by Utah Statute 54-4-41(2) and may propose a rate adjustment if needed.

### **DPU Data Request 1.7**

What is RMP's plan for stations that fail to achieve cost recovery within a reasonable timeframe? Are there criteria for retirement or reclassification of underperforming assets?

### **Response to DPU Data Request 1.7**

The Utah Code that enabled the electric vehicle infrastructure charging program (EVIP) specifies that the overarching objectives of the EVIP are to promote the development of utility-owned vehicle charging infrastructure in the public interest and the availability of utility vehicle charging service. Utah Code 54-4-41(4) and (7) states:

- “(4) The commission shall find a charging infrastructure program to be in the public interest if the commission finds that the charging infrastructure program:*
- (a) increases the availability of electric vehicle battery charging service in the state;*
  - (b) enables the significant deployment of infrastructure that supports electric vehicle battery charging service and utility-owned vehicle charging infrastructure in a manner reasonably expected to increase electric vehicle adoption;*
  - (c) includes an evaluation of investments in the areas of the authority jurisdictional land, as defined in Section 11-58-102, and the point of the mountain state land, as defined in Section 11-59-102;*
  - (d) enables competition, innovation, and customer choice in electric vehicle battery charging services, while promoting low-cost services for electric vehicle battery charging customers; and*
  - (e) provides for ongoing coordination with the Department of Transportation, created in Section 72-1-201.*
- (7) A large-scale electric utility's investment in utility-owned vehicle charging infrastructure is prudently made if the large-scale electric utility demonstrates in a formal adjudicative proceeding before the commission that the investment can reasonably be anticipated to:*
- (a) result in one or more projects that are in the public interest of the large-scale electric utility's customers to reduce transportation sector emissions over a reasonable time period as determined by the commission;*
  - (b) provide the large-scale electric utility's customers significant benefits that may include revenue from utility vehicle charging*

*service that offsets the large-scale electric utility's costs and expenses; and*

- (c) facilitate any other measure that the commission determines:*
  - (i) promotes deployment of utility-owned vehicle charging infrastructure and utility vehicle charging service; or*
  - (ii) creates significant benefits in the long term for customers of the large-scale electric utility”.*

The objectives of the Company-owned charges funded by EVIP do not rely on a cost-effective standard as the enabling statute prioritizes the promotion of the deployment of utility-owned charging infrastructure and overall availability of charging infrastructure to support electric vehicle adoption to be in the public interest.