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To: The Public Service Commission of Utah

From: The Office of Consumer Services

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Date: May 1, 2026

Subject: Docket No. 26-035-19

In the Matter of: Annual Report of Rocky Mountain Power's Electric Vehicle Infrastructure Program

BACKGROUND

On March 31, 2026, Rocky Mountain Power ("RMP" or "Company") filed with the Public Service Commission of Utah ("PSC" or "Commission") its 2025 Annual Report ("2025 Report") for the Electric Vehicle Infrastructure Program ("EVIP" or "Program"). On April 1, 2026, 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 1, 2026, and reply comments on or before May 18, 2026. The Office of Consumer Services ("OCS") provides the following comments on the filing pursuant to that schedule.

OCS DISCUSSION OF RMP'S EVIP ANNUAL REPORT

The OCS reviewed the 2025 Report with a focus on the reasonableness of the outcomes and explanations for the fourth 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 – Accounting Review

After reviewing RMP's accounting summary of the Program, it appears that the Company is still overcollecting system-wide customer surcharge revenues in Schedule 198 relative to the \$5 million estimate that RMP stated would be collected each year in the November 17, 2021, Settlement Stipulation in Docket No. 20-035-34. In 2025, Schedule 198 collected \$7.4 million in revenue, or roughly 48% above the \$5 million target. However, the OCS expects these revenues to decrease starting January 1, 2026, to roughly \$4.2 million per year as a result of the Schedule 198 rate adjustment in the November 6, 2025, Settlement Stipulation. The OCS also observes that direct EV charger usage revenues in Schedule 60 have increased roughly 8.5-fold compared to 2024. Further, the OCS also notes that the EVIP balancing account ended 2025 with a cumulative positive balance of \$30,965, which is the first time since program inception.

While both EVIP revenue streams increased in 2025, expenses have also increased significantly, particularly the operational expenses. While the Program's capital spend for chargers in 2025 is roughly similar to 2024 levels, the operational expenses increased to \$7.2 million from \$918,000 in 2024. This increase in operational expenses raised the total program expenses for 2025 to roughly \$12 million from \$7 million in 2024. The largest increase in costs for 2025 were in the Incentive Admin, O&M, and Innovation line items of the accounting summary:

- **Incentive Admin Costs:** The Division of Public Utilities ("DPU" or "Division") asked in DPU Discovery Request ("DR") 1.1 why "Incentive Admin" costs are elevated this year, to which the Company responded that these 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." RMP further clarifies that these payments represent direct incentive reimbursements rather than administrative overhead.
- **O&M Expenses:** When the Division asked in DPU DR 1.2(b) what the relationship between Operations & Maintenance ("O&M") costs are with sales volume, the Company responded that O&M costs are primarily fixed in the near term and are largely insensitive to utilization or energy throughput, and the variable costs are relatively small in comparison. However, as utilization increases over time, the Company expects revenue growth to outpace incremental increases in O&M costs.
- **Innovation Expenses:** It is the OCS's understanding that the \$3.1 million expense for "Innovation" is the cost for the \$1 million SuperCharge project and \$2.1 million for the Intelligent Integration project, as discussed in the 2024 Annual Report.

Part B – Programmatic Activity Description Review

The 2025 EVIP Annual Report describes activity across four areas of the program: Company-Owned Charging Stations, Make-Ready Infrastructure and Charger Rebates, Innovation and Partnerships, and Educational Outreach and Marketing. The OCS reviewed each of these areas with attention to whether the program delivered meaningful progress for ratepayers in its fourth year of operation and offers the following observations.

RMP-Owned Charging Stations: In 2025, RMP expanded its public charging network with five new sites reaching operational status: Ivie Creek, Layton, Ogden, Orem, and Coalville, bringing the total number of operational charging ports to 48 across nine locations. This is a significant step from the four sites and 22 ports that were operational in 2024. Looking ahead, the report identifies five additional sites in development for 2026. The Draper site became operational in the first quarter of 2026, while West Jordan and West Valley City have completed engineering design and are in the permitting phase, Midvale is under construction and Farmington is in engineering design.

The average charger availability across all 48 ports was 98.96 percent for 2025, a slight improvement over the 97.52 percent reported across the initial four sites in 2024. The OCS commends RMP and the network operator for sustaining strong availability performance as the network expanded and views this as an important metric to be maintained as additional sites come online in 2026.

The 2025 report presents charger utilization data by site, referring to the metric as a utilization factor, which is calculated as the total kWh dispensed at a site divided by the maximum potential output. The maximum potential output is calculated as installed capacity multiplied by 24 hours multiplied by the number of days the site was in operation. The OCS notes that this is mathematically equivalent to the load factor reported in the 2024 annual report which was defined as average power dispensed divided by maximum power available at the site and recommends that the Company strive to be consistent in its use of terminology to facilitate year to year comparisons of the metrics. The overall average utilization factor across all nine sites is reported at 3 percent for 2025, compared to an average load factor of 10 percent reported across the four initial sites in 2024. The OCS acknowledges that the expansion of the network from four to nine sites in 2025, with several locations becoming operational late in the reporting year, may partially account for the lower overall average.

The OCS also recognizes that the Company's calculation of the utilization factor may be skewing the utilization rates and recommends that RMP supplement its current utilization metric to provide a more realistic view of charger utilization. The Company acknowledged in its 2025 Report that the utilization factor's "maximum potential assumes that all chargers are operating at maximum output for 24 hours a day, which is virtually impossible, but represents a technical limit". Additionally, because the current methodology divides the total kWh dispensed by the 350kW maximum potential output of the charger when few EVs can

accept a 350kW charge, this formula skews the utilization factor downward. In other words, a charger could be occupied 24/7 by vehicles with lower max charge capacity (i.e., 250kW, 130kW, 55kW) and still produce a low utilization factor. As such, the OCS recommends that RMP include additional utilization metrics, such as the total number of hours vehicles were charging at sites, and hourly or higher-resolution time series data per charger.

Make-Ready Infrastructure and Charger Rebates: Schedule 120, which authorized Make-Ready Infrastructure incentives and charger rebates to eligible customers, reached its termination date of January 1, 2025, consistent with the terms of the November 17, 2021, Settlement Stipulation. No new project applications were awarded in 2025. However, a number of preauthorized projects were completed during the year and the Company reports that additional preauthorized projects are expected to be finalized through 2026, with results to be reflected in future annual reports.

According to the report, \$2,717,207 was paid out in 2025 across 66 completed applications spanning Make-Ready infrastructure, DC fast charger rebates, AC Level 2 rebates and residential charger rebates. The OCS notes that the activity reflected in the report is consistent with the wind-down phase of the program as stipulated.

The OCS notes that this year's report presents project activity on a paid basis this year, whereas prior annual reports presented activity on an awarded basis. The OCS understands that awards and payments do not always fall within the same reporting period.

Innovation and Partnerships: In 2025, RMP continued its engagement with several active innovation initiatives, including WestSmartEV@Scale, eMoviatic, SuperCharge, Intelligent Integration, and Connected Communities. The Company also continued its participation in the Electrification of Transportation Infrastructure Steering Committee, which meets quarterly and includes representatives from the Governor's Office of Economic Opportunity, the Governor's Office of Energy Development, among others.

The 2025 report introduces two new partnerships. RMP began working with the Utah Division of Air Quality on the Clean School Bus program, which supports school districts in funding the procurement of electric buses and associated charging infrastructure. The report also describes the Clean Ports Project, which received \$110 million in EPA funding directed toward electrifying the Union Pacific Intermodal Port facility, covering both port operations and drayage truck electrification. The OCS acknowledges the scope of these partnerships and their contribution to broader transportation electrification goals in Utah. The OCS looks forward to updates on these initiatives in future annual reports.

Educational Outreach and Marketing: The report states that the Company suspended most outreach and education activities during 2025 while the program review was underway, with a revised outreach plan to be developed for 2026. The outreach that did occur in 2025 was tied to the April grand opening events for four newly operational charging

stations such as Ogden, Layton, Orem, and Ivie Creek. RMP utilized both earned and paid media at these events, with messaging centered on the importance of off-peak hour charging.

RECOMMENDATIONS

Following our review of RMP's 2025 EVIP Annual Report, the OCS recommends that the PSC acknowledge the annual report, as it generally complies with Program reporting requirements and the terms of the November 6, 2025 Settlement Stipulation. The OCS also recommends that RMP include additional utilization metrics, such as the total number of hours vehicles were charging at sites, and hourly or higher-resolution time series data per charger to provide more realistic metrics of charger utilization.