

May 18, 2026

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 Administration

RE: Docket No. 26-035-19 – Annual Report of Rocky Mountain Power’s Electric Vehicle Infrastructure Program
Rocky Mountain Power’s Reply Comments

On March 31, 2026, PacifiCorp, d.b.a. Rocky Mountain Power (“the Company”), submitted its annual report for the Electric Vehicle Infrastructure Program (“EVIP Report”) to the Public Service Commission of Utah (“Commission”). On April 29, and May 1, 2026, respectively, the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”) filed comments which included recommendations for future annual reports.¹ The Company submits these reply comments to address the comments from the Division and the Office.

Response to Division’s Comments

The Division recommends the Commission acknowledge the EVIP Report as meeting the requirements, and that future reports include cumulative allocation reporting, reporting on the Schedule 60 cost-of-service glide path and reporting on the trajectory of the Schedule 198 collection.² The Division also comments on the accounting presented for program costs and revenues. The Settlement Stipulation filed on November 9, 2025 in Docket No. 20-035-34 (“2025 Settlement Stipulation”) specifies how EVIP funds will be allocated among Company-owned chargers, make-ready investment incentives, Schedule 120 incentives and education and outreach. As noted by the Division, the changes made to the EVIP in the 2025 Settlement Stipulation begin in 2026 and the Division requests the Company enhance future reporting to better track the program spending against the amounts allocated in the 2025 Settlement Stipulation.

¹ Public Service Commission of Utah, Docket No. 26-035-19, Annual Report of Rocky Mountain Power’s Electric Vehicle Infrastructure Program, Comments from the Division of Public Utilities, filed April 29, 2026. (“Division’s Comments” or “DPU Action Request Response”).

Public Service Commission of Utah, Docket No. 26-035-19, Annual Report of Rocky Mountain Power’s Electric Vehicle Infrastructure Program, Comments from the Office of Consumer Services, filed May 1, 2026. (“Office’s Comments”).

² Division’s Comments, at 1-2.

The Company appreciates the Division's conscientious recommendation and agrees to revise the EVIP report going forward so that the spending categories can be better tied to the 2025 Settlement Stipulation. This includes labeling costs into clear categories as suggested by the Division.

The Division also discusses the collection of program revenues under Electric Service Schedule No. 198 – Electric Vehicle Infrastructure Program (EVIP) Cost Adjustment (“Schedule 198”), noting that the collections have exceeded the \$5 million per year target the rates were designed to collect. The overcollection has been noted in previous EVIP reports and the Schedule 198 rates were decreased effective January 1, 2026 to reduce the amount collected to prevent exceeding the total allowed collections of \$50 million.³ The Division requests the Company include a forecast of Schedule 198 collections in future EVIP reports to help monitor the collections. The Company agrees to the Division's recommendation.

In the 2025 Settlement Stipulation, the Company agreed to a glide path for changes to the rates for Company-owned chargers under Electric Service Schedule No. 60 (“Schedule 60”) as part of the annual cost of service study filings. The rate increase will be a minimum of 5 percent of Schedule 60's share of cost of service, with the Schedule 60 rate increase not to exceed more than 10 percent annually.

The Division expresses concern regarding Schedule 60 rates. The Division states that cost of service rates for Schedule 60 and Schedule 198 cover the expenses of the EVIP and once Schedule 198 expires, only Schedule 60 will remain to cover program expenses. The Divisions states that this could result in the “program being committed to charging rates that don't make commercial sense.”⁴ The Division requests the Company demonstrate a thorough understanding of rates charged by competitors in proceedings involving adjustments to Schedule 60 rates.

The Company agrees that Schedule 60 rates should be set at a level that enables competition, innovation and customer choice in electric vehicle charging services as expressly intended by the enabling statute.⁵ With regards to the Division's concerns with how Schedule 60 charging rates will be determined once Schedule 198 is discontinued, this issue will be ripe in the next EVIP program review filed June 30, 2029 when the final years and close out of the EVIP is planned.

The Company will file its next annual cost of service study on June 15, 2026. On this same date and consistent with the 2025 Settlement Stipulation, the Company will file for and propose the necessary rate adjustments for Schedule 60 using this same cost of service study. The Company will include information regarding competitive charging rates to inform and support the recommendations for Schedule 60 rates.

Finally, the Division also recommends future EVIP reports include a status report on the Schedule 60 cost of service glide path. The Company notes that the EVIP report is filed on April 30 of each year and the cost of service study is filed June 15. Based on this timing, the information on the cost of service study glide path will not be available to include in the April 30 EVIP report.

³ Utah Code Annotated § 54-4-41(2)(a).

⁴ DPU Action Request Response, at 6 (Apr. 29, 2026).

⁵ Utah Code Annotated § 54-4-41(4)(d).

Therefore the Company recommends the Commission not adopt this recommendation by the Division.

Response to Office's Comments

The Office's reviewed the EVIP Report and highlights aspects such as the program accounting, performance of Company-owned charging stations, status of make-ready and Schedule 120 incentives, activities for innovation and partnerships and efforts of educational outreach. The Office recommends the Commission acknowledge the EVIP Report as complying with the reporting requirements with one recommendation.

The Office states that the Company's calculation of the utilization factor for Company-owned charging infrastructure may be skewing the utilization rates and recommends the Company supplement its metric with additional information. Specifically, the Office recommends the Company include the additional utilization metrics, such as total number of hours vehicles were charging at sites, and hourly or higher-resolution time series data per charger.⁶ The Company will work with its vendor to provide available data as requested by the Office.

Conclusion

The Company appreciates the efforts of the Division and Office to review the annual EVIP Report. The Company requests the Commission acknowledge the EVIP Report as meeting the reporting requirements and agrees to implement the changes to future EVIP reports as discussed in these comments.

Informal inquiries on this matter may be directed to Max Backlund at max.backlund@pacificorp.com.

Sincerely,



Jana Saba
Director, Regulation and Regulatory Operations

Cc: Service List

⁶ Office's Comments, at 5.

CERTIFICATE OF SERVICE

Docket No. 26-035-19

I hereby certify that on May 18, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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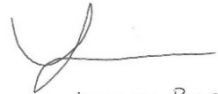
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