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Executive Director and Secretary
Washington Utilities and Transportation Commission
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RE: Docket UE-160799—PacifiCorp's Comments

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) appreciates the opportunity to submit comments to the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to File Written Comments in this proceeding to potentially revise the 2017 Policy and Interpretive Statement regarding electric vehicle (EV) supply equipment.

PacifiCorp submitted its first Washington Transportation Electrification (TE) Plan, in accordance with RCW 80.28.365, on May 20, 2022. The Company continued to engage with Commission Staff, customers, stakeholders, and industry partners to further refine its approach to addressing the rapidly evolving transportation electrification sector. That work resulted in refinement to the plan as originally submitted and an addendum was filed September 28, 2022. The Commission issued a letter acknowledging the PacifiCorp TE Plan on October 27, 2022. PacifiCorp is currently implementing a number of programs under this TE Plan and continues to collaborate with stakeholders to further transportation electrification.

PacifiCorp has discussed and collaborated with the other investor-owned utilities (IOUs) regarding the questions shared below. PacifiCorp is in agreement and supportive of comments filed by Puget Sound Energy and Avista Utilities, and appreciates the opportunity to share the company's insights in Washington leveraging the experience gained in Oregon and Utah.

PacifiCorp offers the following comments:

1. What types of ratemaking tools should the Commission consider for EV charging infrastructure? For each option, please explain why such tools are appropriate:
   a. A system benefits charge for all customers that create a budget for utilities?
   b. Capital expenses for EV infrastructure recovered in base rates?
   c. Increased incentives for Multi-Unit Dwelling building owners or developers?
   d. A line extension allowance similar to that proposed in Oregon?

PacifiCorp believes that the Commission should allow for flexibility in ratemaking to suit each utility's unique circumstances. The Commission could allow a forecasting and simultaneous recovery mechanism like the system benefits charge for conservation costs and demand

response. This would further promote EV investments in Washington by allowing the utility to recover costs without regulatory lag and would also have the benefit of eliminating carrying costs for customers. This would allow for different types of customer programs to be recovered in a similar manner. PacifiCorp's current EV expenditures are tracked through deferred accounting treatment, which is then incorporated into base rates at a future ratemaking proceeding, such as a general rate case. For PacifiCorp's current circumstances in its Washington service area, this allows the company to recover its costs in a way that is appropriate for newer investments that are difficult to forecast a baseline rate for. There may come a time where EV infrastructure costs are more stable and predictable, at which point those costs could be incorporated into base rates like other capital investments.

PacifiCorp multi-unit dwelling (MUD) programs have seen challenges in uptake in Oregon and more success in uptake in Utah due to make-ready incentives that provide substantial support for EVSE installation. PacifiCorp recommends rethinking how to provide incentives to multi-unit dwellings, which is key to ensure equitable uptake of electric vehicles. PacifiCorp suggests considering workplace and alternative charging locations (convenience store, fitness club), right of way charging, as other ways to support MUD dwellers. Many MUD residents charge at work during the day coincidentally during off-peak times.

In Oregon, the Company will grant Nonresidential Applicants, for which 80% or greater of the estimated annual load of Applicant's facilities' will be dedicated to serving transportation charging infrastructure, two times the estimated annual revenue, which the Applicant is expected to pay the Company in a year of normal operations under cost-based service[1]. The Applicant must advance the costs exceeding the Extension Allowance. The Applicant must pay a Contract Minimum Billing for as long as service is taken. While this line extension allowance has provided relief to some customers, it has also caused challenges for those customers whose estimated annual load is lower than what was estimated causing larger monthly bill minimums. In consideration of this, care should be taken when devising line extension allowance policies to consider those factors.

2. In a time of upward pressure on utility rates, how can the Commission balance the need for more proactive planning with transportation electrification infrastructure while sufficiently protecting ratepayers and mitigating risks? (i.e. overbuilding or unanticipated costs)
   a. Please provide any known resources or examples demonstrating your proposal.

PacifiCorp believes that continuing to look to other states where this work is actively progressing. Learning from these states will ensure best practices are adopted in Washington. While PacifiCorp's Washington service area is currently still in early stages of TE development, and not at risk of overbuilding anytime soon, protecting customers and mitigating risks is a high priority for the Company. PacifiCorp hopes to learn from the experiences of other utilities in areas with faster growth, both within Washington and elsewhere. This is something that the company is monitoring closely.

[1] https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/rates-regulation/oregon/tariffs/rules/13_Line_Extensions.pdf

3. At what point should Transportation Electrification programs be rate-based rather than customer specific tariff schedules?
   a. At what percentage of use (percent of time used for charging) do public chargers "break even" for EVSE owners?
   b. Does this percentage of use vary based on geographic location? If yes, please describe the variation and causes of variation by geographic location.
   c. Does this percentage of use vary for L1, L2, or DCFC? If so, please provide the percentages for each charging type, and explain the reason for the variation.
   d. Are there any other factors that contribute to differences in percentage of use?

PacifiCorp believes that companies should have flexibility on proposed methods of recovery. At this time, PacifiCorp does not propose to have EV programs included in rate base.

PacifiCorp provides electric service to over 243 communities in our service area; many of these communities are rural. Over the last years, PacifiCorp has seen that public charger use for Direct Current Fast Chargers (DCFC) continue to see load factors ranging from 1 to 10%. When customers are looking to install charging infrastructure, PacifiCorp often recommends using a load factor of 3%.

4. Some utilities across the country have implemented (or plan to implement) a flat-rate charging program for EVs. (i.e. For $35 per month, a customer can charge as much as they want during off-peak hours) Would a similar construct be viable in Washington?
   a. If so, what dollar amount would the utility need to recover for such a program to be economically feasible?
   b. Would this practice be equitable if a discounted flat-rate option was available for low-income EV customers? (i.e., low-income customers could pay $20 per month for unlimited off-peak charging, whereas other customers would pay $35 per month)
   c. For charging stations with high intensity, but infrequent use, the utility may assess a demand charge which may be passed on to the charging provider and ultimately customers. Do third-party providers absorb significant costs for demand charges?
   d. If so, provide the percentage of all chargers subject to a demand charge detailed by utility owned chargers and third-party owned chargers.

PacifiCorp has seen utilities implement this strategy in different parts of the country. PacifiCorp is supportive of considering alternative and supportive rate structures for different customer types. Given differences in service areas, and differing billing and metering systems, the Company cautions against employing a "one-size-fits-all" approach for the utilities. In Utah, PacifiCorp has been working with Electric Vehicle Service Providers (EVSPs) to provide discounted rates at publicly available PacifiCorp owned charging stations for customers. This is through enabling a membership account with the specific EVSP and receiving a specific discounted code. Customers can utilize these chargers and receive a discounted rate to charge. PacifiCorp is looking to expand this to other states.

5. What data sources does your utility utilize when estimating EV ownership within your territory?
   a. How does your utility incorporate these datasets into your resource planning/distribution system planning/capital decision planning assumptions? Please include at least the following planning assumptions and how you determine them:
      - Number of EVs (broken down by LDV and MHD) in service territory by 2030, 2035, and 2040.
      - Distribution, transmission, and resource acquisition needs specifically attributed to EV load growth.
      - Distribution of costs to ratepayers (all customer classes for all investments? Just EV customers? Both?)
   b. How do these datasets influence distribution system planning processes?
   c. What barriers has your utility identified that prevents widespread EV adoption within your territory?

PacifiCorp documented the forecasting and estimating process for EVs in the Addendum provided on September 28th, 2022.[2] PacifiCorp continues to use nationwide models that are downscaled to local contexts. Forecasts occur on an annual basis and layered with actual adoption from previous years. MD/HD forecasts will be integrated into 2025 planning forecasts after recent studies were completed for PacifiCorp. These forecasts are taken into consideration during integrated resource planning processes.

Barriers that prevent widespread EV adoption within our service area continue to be cost of ownership of electric vehicles themselves. Only about 1% of customers within our service area own electric vehicles.

6. What data does your utility obtain from EV telematics software on private chargers in its service territory? How does your utility use this data?
   a. Provide the number of public and private chargers in your service territory broken down by L1, L2, and DCFC.
   b. Provide the number of customers/vehicles on a managed charging program in your service territory.
   c. What are the most common consumption rates for utility owned chargers within your service territory specified by charger type? (L1, L2, and DCFC)
   d. What are the most common consumption rates for all chargers within your service territory specified by type? (L1, L2, and DCFC)
   e. What is the average usage or utilization rates for utility owned chargers of each type? (L1, L2, and DCFC)
   f. What is the average usage or utilization rates for all chargers within your service territory by type? (L1, L2, and DCFC)

PacifiCorp began implementing new programming in 2024 to customers. Numbers of public and private chargers by level and port are not available at this time. PacifiCorp provided public available counts broken down by highly impacted community on July 1st, 2024 as part of the

[2] https://www.utc.wa.gov/casedocket/2022/220359/docsets

Clean Energy Implementation Plan 2024 Progress Report[3]. PacifiCorp plans to implement a managed charging program in 2025 in Washington, but does not currently have a program active.

PacifiCorp anticipates by end of October to have the Company's first utility-owned chargers available to public use. Session data will be gathered and analyzed. PacifiCorp is also planning to build a data dashboard to support understanding of the questions stated above for both utility-owned and program-enabled ports throughout Washington. This database development is currently underway.

7. Some estimates note that approximately 80 percent of light-duty vehicle (LDV)6 charging is completed at home. If this charging is unmanaged, the periodic demand increases can quickly eliminate any available capacity at the distribution level. Managed charging mechanisms can help spread this demand to off-peak hours and mitigate the load stress of the system. What managed charging programs does your utility offer?
    a. For utilities with time-of-use rates (on-peak, off-peak, and etc.) please provide graphs displaying your on-peak hours, off-peak hours and any super off-peak hours. Please include whether participation in these programs is the default option or if customers must opt-in.
    b. Please provide the raw number (and percentage) of EV customers that participate in some form of static load control. (i.e., customers that allow for the utility to dictate when charging occurs by use of vehicle telematics or software on the smart charging device)
        i. For those customers using active load control, please detail the load reductions at the most granular level available as a result of these programs.
    c. Please provide the raw number (and percentage) of EV customers that participate in some form of dynamic load control. (i.e., customers that participate in time-of-use rates or other charging programs specifically for EV customers) i. For those customers using passive load control, detail the load reductions at the feeder level seen at the most granular level available as a result of these programs?

PacifiCorp does not currently offer managed charging programs in Washington, but has plans to offer programming in 2025. Applications were filed in July of 2023[4], where more detail can be found regarding potential program design.

PacifiCorp runs a pilot Time of Use rate for customers[5], both residential and commercial. This is an optional time of use pilot available to all residential customers and is not specifically tied to electric vehicle ownership or programs. The below graph shows the on-peak and off-peak times. The Company plans to file a final report on the residential time of use pilot on November 1, 2024. EV customers participating in load control is not relevant at this time as EV programs and pilots are not actively linked to the Time of Use.

[3] https://www.utc.wa.gov/casedocket/2021/210829/docsets
[4] https://www.utc.wa.gov/casedocket/2022/220359/docsets
[5] https://www.pacificpower.net/savings-energy-choices/time-of-use.html

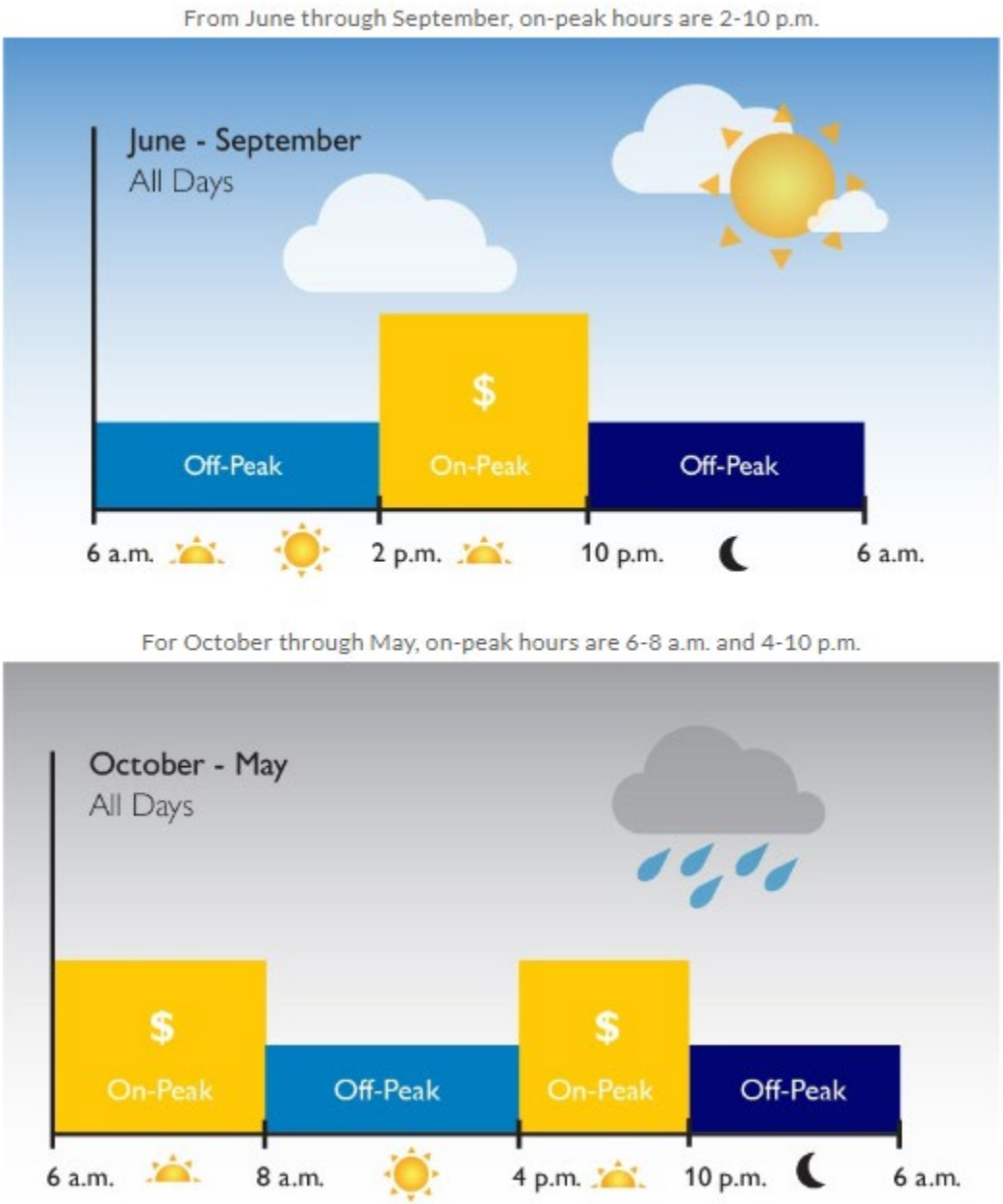

Figure 1: Washington Time of Use Graphs

8. EV infrastructure are common targets for theft and vandalism. What studies or programs are you aware of that address issues of vandalism and/or theft of EV supply equipment?
   a. Does your utility track information and expenses related to instances of damage, theft, or vandalism of EVSE?
   b. If so, please detail the costs your utility has spent for 2022 and 2023 to repair or replace vandalized EVSE infrastructure in your service territory?

PacifiCorp does track expenses in Oregon related to damage of EVSE infrastructure. This will also occur in Washington once those stations are fully energized. In most occasions, these costs

are covered under warranty and Operations and Maintenance plans provided by the EVSPs. Overall theft at stations in Oregon has been relatively low, but ongoing damage continues to occur due to wear and tear on the stations requiring preventative and continual upkeep.

9. What is your utility's process to repair inoperable EVSE equipment? Please detail the process and timelines from the moment the utility is notified to re-energization of the EVSE.
    a. Does your utility track and maintain records on the operability of EVSE equipment in your service territory? If so, does your utility track solely public or utility-owned EVSE or does it track 3rd party owned as well?
    b. Does your utility contract with a 3rd party provider to fix and/or repair EVSE? If so, please provide the names of each third-party contractor.
    c. Please provide the names of each 3rd party provider contracted with your utility as well as the cumulative costs your utility has incurred for these services for 2022 and 2023.

PacifiCorp provides continual operations and maintenance of utility-owned EVSE equipment through third-party contractors with the contracted EVSPs. Timelines vary on equipment malfunction and parts availability. PacifiCorp monitors station uptime and session data of all utility-owned stations. PacifiCorp is looking to expand this to program-enabled ports as well. The contracts through the EVSP, on most occasions, covers the fix or repairs. In some instances, PacifiCorp will have to pay out of pocket to cover costs and preventative maintenance is often not covered in these contracts. PacifiCorp employs an EV Operations Manager to maintain utility-owned stations. PacifiCorp does currently have these services contracted yet in Washington.

PacifiCorp appreciates the opportunity to provide comments in this proceeding and looks forward to continued discussions as the Commission considers revisions to its policy statement.

Sincerely,

/s/

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