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Portland, Oregon 97232

September 29, 2022

***VIA ELECTRONIC FILING***

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Received  
Records Management  
09/29/2022  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Advice 22-04—Schedule 60—Company Operated Electric Vehicle Charging Station Service**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp) submits this proposed tariff applicable to PacifiCorp's electric service in the state of Washington in compliance with RCW 80.28.050, WAC Chapter 480-80 et. seq., and the Washington Utilities and Transportation Commission's (Commission) Rules and Regulations. PacifiCorp respectfully requests an effective date of October 31, 2022.

Second Revision of Sheet No. INDEX.2

Tariff Index

Original Sheet No. 60.1

Schedule 60

Company Operated Electric Vehicle Charging  
Station Service

**Purpose**

In 2020, PacifiCorp was awarded funding from the US Department of Ecology to build a direct current fast charging (DCFC) pod in Yakima using the Volkswagen settlement funds, which will fund 50% of the project costs.

PacifiCorp is partnering with the downtown Hilton Garden Inn to install this charging pod, which will consist of four dual protocol DC Fast Chargers and one Level 2 pedestal charger. The charger location will support local business—with multiple restaurants and hotels nearby—in addition to supporting electric vehicle (EV) adoption in rural Washington more broadly. Yakima is a key high-traffic corridor in the eastern part of the state, intersected by multiple highways and thoroughfares. The proposed chargers are situated near US routes 12, 97, and 24; state route 821; and interstate 82. While this makes Yakima a critical connection point for southeast Washington, it also means that its residents are disproportionately affected by transit pollution. The census tract where the chargers are proposed scores a 9 out of 10 on the Diesel and Disproportionately Impacted Communities Index. By increasing the availability of charging infrastructure, this project will support EV adoption in the community and the associated reduction in transit pollution and additional benefits it provides.

While this will add an additional four DCFC ports and one Level 2 dual-port charging station, additional work to provide increased public charging is still needed in PacifiCorp's service area.

### **Station Pricing**

To enable PacifiCorp to charge for EV charging service, it proposes a new Schedule 60 tariff that specifies pricing for charging services as well as some of the terms and conditions for its stations. PacifiCorp proposes the following prices for both DCFC and level 2 charging stations. Any individual using Company-operated electric vehicle charging stations for the purpose of recharging the battery of an EV shall pay for such service as the rates described below, plus the applicable adjustment(s) as specified in Schedule 60.

### **Charging Stations under 19.2 kW (Level 2)**

Level 2 Charging Costs: For level 2 charging the proposed price is 12¢ per kWh. This price was set to be at about the same level as the highest price tier under Schedule 24, which is 11.906¢ per kWh, so that this price would mimic the highest incremental cost to an electric bill that the Company anticipates a commercial customer might pay to provide this slower and less peaky level of charging. Level 2 charging is an ancillary service that will complement PacifiCorp's DC fast charging service.

### **Charging Stations over 19.2 kW (DC Fast Charging)**

For DCFC, the proposed price is 39¢ per kWh. This rate was determined by averaging Washington state's other two investor-owned utilities' prices.

### **Tariff Provisions**

The proposed Schedule 60 tariff will include the following tariff provisions:

1. The operation, repair and maintenance of EV charging stations on this rate schedule will be the responsibility of the Company.
2. Inoperable EV charging stations will be repaired as soon as reasonably possible, during regular business hours or as allowed by Company's operation schedule and requirements, provided the Company receives notification from a consumer or member of the public by notifying PacifiCorp's Customer Service (1-888-221-7070).
3. The Company may, at its discretion, install, relocate, modify, or remove EV charging stations. Potential modifications to Company-operated EV charging stations may include adding, removing, or changing EV charging stations may include adding, removing, or changing EV supply equipment available for charging service.
4. Additional idle fees of 40¢ per minute will be incurred 10 minutes after the charging session has been completed. The goal of these fees is to encourage customers to move their vehicles as soon as the charging session is completed to allow more customers to access the service. This idle fee is consistent with national idle fee standards for DCFC stations.

### **Accounting**

The Company proposes that revenue collected from its stations on Schedule 60 would be applied to the Company's EV balancing account and specifically used to offset the costs of transportation electrification programs and/or provide additional funding for future programs.

Washington Utilities and Transportation Commission

September 29, 2022

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PacifiCorp respectfully requests that all formal data requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

Please direct any informal questions about this filing to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,



Shelley McCoy  
Director, Regulation

Enclosures

22-04-PAC-Attach-A-9-29-22.pdf

22-04-PAC-Attach-B-9-29-22.pdf

## Appendix A: Stakeholder Feedback

| Item Number | Comments Received   | Response Provided  |
|-------------|---|--|
| 1           | It would be helpful for the Company to provide more information on how PacifiCorp developed the Level 2 charging rate, as it may not reflect the entire cost of providing EV charging services. | To develop its level 2 charging price, the Company simply used its highest first tier Schedule 24 energy price. This level reflects the highest cost that the Company expects a customer would typically pay for utility service for a level 2 charger. A larger commercial customer would pay less per kWh and have some profit margin left over to pay for some of the cost of the charger itself. The Company believes that the price does not need to reflect the full cost of the charger, because other providers often have large proportions of their cost provided for by grants, tax credits and other subsidies. A quick scan of prices for level 2 chargers in the Company's service territory shows that the Company's proposed 12 cents per kWh does not undercut the pricing for other stations. In many instances, level 2 charging is offered as a free service. Providing level 2 charging at an affordable level promotes equity as customers from underserved and vulnerable communities may live in multi-family dwellings and not have access to at home charging. |
| 2           | Will the phone number be displayed on the EVSE?   | Yes, the Company will include contact information.   |
| 3           | Does PacifiCorp have workpapers showing how it arrived at this price point? If so, Staff would like to review those   | No. The Company simply rounded the 11.906 to 12. Rounding in this way produces a price that the Company expects will be more understandable to customers, particularly those who only occasionally use this service.   |
| 4           | Why is mimicking Schedule 24 appropriate for EVSE service?  | The Company expects customers to use Level 2 service primarily as a back-up to DCFC service, and, therefore, proposes to base the pricing for Level 2 service on the marginal energy cost that a customer with a similar load size would pay. Because the Company bills these similarly-sized customers according to Schedule 24, the Company proposes basing Level 2 pricing on the current Schedule 24 prices for marginal energy usage.   |
| 5           | Why is \$0.39/kWh appropriate for PacifiCorp? Is it tied to the cost to serve customers at all?   | \$0.39/kWh is appropriate because it is an average of the prices that the two Companies most similar to PacifiCorp are charging. Tying this price to the Company's costs could create a high variance in the regional costs for DCFC service, which could harm the market for this service as it develops.   |

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| 6 | Which standards are these? Please provide | <p>As of 8/19/2022, customers of both PSE and Electrify America stations can incur similar idle fees.</p> <p>See:<br/><a href="https://www.pse.com/en/pages/electric-cars/charging-with-pse#:~:text=Charging%20station%20pricing&amp;text=The%20cost%20to%20charge%20at%20an%20Up%20%26%20Go%20Electric%20public,for%20a%20Level%20%20charger.">https://www.pse.com/en/pages/electric-cars/charging-with-pse#:~:text=Charging%20station%20pricing&amp;text=The%20cost%20to%20charge%20at%20an%20Up%20%26%20Go%20Electric%20public,for%20a%20Level%20%20charger.</a></p> <p>Also:<br/><a href="https://www.electrifyamerica.com/pricing/">https://www.electrifyamerica.com/pricing/</a></p> |
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