

Rocky Mountain Power
Docket No. 16-035-36
Witness: William J. Comeau

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Direct Testimony of William J. Comeau

January 2017

1 **Q. Please state your name, business address and present position with PacifiCorp dba**
2 **Rocky Mountain Power (“the Company”).**

3 A. My name is William J. Comeau and my business address is 1407 West North Temple,
4 Suite 330, Salt Lake City, Utah, 84116. I am currently employed as the Director of
5 Customer Solutions for Rocky Mountain Power.

6 **QUALIFICATIONS**

7 **Q. Briefly describe your educational and professional background.**

8 A. I have a Bachelor of Science from Weber State University and a Master of Business
9 Administration from Keller University. During my 17 years of working in the utility
10 industry, I have held responsibilities including economic development, customer
11 service, demand side management, and since March 2015, Director of Customer
12 Solutions.

13 **Q. What are your responsibilities as Director of Customer Solutions?**

14 A. My primary responsibilities include the development and implementation of customer
15 programs such as, *watt*smart energy efficiency, and renewables through the Blue Sky
16 and Subscriber Solar programs.

17 **PURPOSE OF TESTIMONY**

18 **Q. What is the purpose of your testimony in this proceeding?**

19 A. My testimony supports the Company’s proposed Plug-in Electric Vehicle Incentive
20 Pilot Program (“PEV Program”) described in the Application, and the proposed tariff
21 sheets attached as Exhibit A thereto. The Company has modified some aspects of the
22 PEV Program and proposed tariff sheets provided in the Application based on
23 stakeholder discussions and the inclusion of a Time of Use (“TOU”) incentive. Current

24 program designs for the PEV Program are discussed in the sections below. Through the
25 Application and my direct testimony and the direct testimony of Mr. Robert M.
26 Meredith, the Company seeks Commission authorization for this program under
27 U.C.A. § 54-20-103.

28 **STAKEHOLDER INVOLVEMENT**

29 **Q. How were stakeholders involved in the development of the PEV Program?**

30 A. Prior to filing the initial PEV Program proposal that was included in the original
31 Application in this docket, the Company held a workshop on May 10, 2016 to provide
32 background information on PEV adoption in Utah and to discuss concepts for
33 promoting PEV infrastructure with the PEV Program. The Division of Public Utilities
34 (“DPU”), Office of Consumer Services (“OCS”), Utah Association of Energy Users
35 (“UAE”), Utah Clean Energy (“UCE”), Western Resource Advocates (“WRA”),
36 Division of Air Quality (“DAQ”), Southwest Energy Efficiency Project (“SWEEP”),
37 City of Salt Lake City (“City of SLC”), Utah Clean Cities (“UCC”), Office of Energy
38 Development (“OED”), and others attended the May 10th workshop. Subsequently,
39 stakeholders also participated in the following:

- 40 • May 20, 2016 - Workshop meeting notes/talking points, and reading list of PEV
41 materials circulated to stakeholder group;
- 42 • July 27, 2016 - Draft Advice Letter and Proposed Tariff developed from
43 workshop meeting takeaways was circulated to stakeholder group for review
44 and comment;

- 45 • Early August 2016 - Written/verbal comments and data requests from DPU,
46 OCS, UCE, City of SLC, EVgo, and ChargePoint were received by the
47 Company;
- 48 • Mid-August 2016 - Responses to all comments and data requests sent back to
49 stakeholders;
- 50 • Late August 2016 - Various adjustments were made to the draft Advice Letter
51 and Tariff based on stakeholder feedback; and
- 52 • September 12, 2016 - Advice Letter was consolidated with the STEP
53 Application and submitted in Docket No. 16-035-36.
- 54 Another workshop meeting was held with stakeholders January 10, 2017, to
55 serve as a refresher for PEV Program concepts and discuss any necessary changes prior
56 to submitting them for approval.

57 **PLUG-IN ELECTRIC VEHICLE PROGRAM**

58 **Q. Please describe the Company's proposed Plug-in Electric Vehicle Pilot Program.**

59 A. The proposed components of the PEV Program include the following:

- 60 • Annually allocate a portion of the PEV Program budget to administration,
61 outreach and awareness for PEVs, Time of Use rates, and potential grant
62 opportunities to leverage available funds for increased PEV infrastructure and
63 outreach.
- 64 • The Company issued a Request for Proposals (“RFP”) to select a vendor to
65 administer the PEV Program on December 14, 2016.
- 66 • The Company proposes to provide prescriptive incentives for participation in
67 the Time of Use Pilot Program (“EV TOU Pilot”), TOU load research study,

68 Non-Residential AC Level 2 Chargers and DC Fast Chargers, as well as custom
69 incentives for projects/partnerships that may be submitted to the Company for
70 consideration. The prescriptive incentives are intended to provide an easy path
71 for customers by allowing them to participate in the EV TOU Pilot or purchase
72 a charger and receive an incentive. The custom incentives are intended for
73 complex projects that require funding assistance and provide PEV infrastructure
74 benefits.

- 75 • The PEV Program budget will consist of up to \$2 million per year for five
76 years.

77 The Company intends to market the PEV Program and provide education on
78 the system impacts and benefits to customers. This includes development of a website
79 containing detailed information about the PEV Program and tools for customers to
80 better understand impacts on the grid and appropriate charging behavior. The Company
81 may consider an outreach partner to perform strategic PEV outreach and awareness,
82 which may include social media components such as a mobile application to assist
83 customers with their charging decisions.

84 The Company issued an RFP December 14, 2016, to select a vendor to
85 administer the PEV Program. No funds will be spent until the PEV Program has been
86 authorized by the Commission. The PEV Program administrator may be responsible
87 for items such as:

- 88 • Customer engagement;
- 89 • Continual improvements of PEV Program operations and customer
90 satisfaction;

- 91 • Incentive processing and call-center operations;
- 92 • PEV Program specific customer communication and outreach;
- 93 • Reviewing custom applications and providing recommendations; and
- 94 • Outreach and communications.

95 Through this PEV Program, the Company proposes to incentivize participation
96 in the TOU Pilot Program,¹ non-residential AC Level 2 Chargers, DC Fast Chargers,
97 and custom projects:

- 98 • *Time of Use Prescriptive Incentive* - This incentive is intended to obtain
99 customer participation in TOU rates and the TOU load research study. The
100 Company proposes to have a maximum incentive amount of “up to” \$200 per
101 customer that participates in the TOU Pilot Program, with the initial incentive
102 offering set at the maximum amount of \$200 when the program becomes
103 effective. Participants in the load research study will also be eligible for a \$200
104 incentive per customer. The incentive amounts may be adjusted below the
105 maximum range via a 45-day notice posted to the Company's website. Other
106 special conditions regarding this incentive include, but are not limited to, the
107 following:

108 i. To be eligible, customers must meet all participation requirements and
109 special conditions established in Electric Service Schedule 2E.

- 110 • *Non-Residential AC Level 2 Charger Prescriptive Incentive* - This measure will
111 promote new AC Level 2 Charger infrastructure among businesses and multi-
112 family dwellings. The Company proposes to have a maximum incentive amount

¹ See Direct Testimony of Robert Meredith submitted in Docket No. 16-035-36.

113 of “up to” \$3,000 per charger for this measure for flexibility to adjust to the
114 market, with an initial offering of \$1,500 per charger when the PEV Program
115 becomes effective, as this amount is assumed to drive participation. Incentives
116 will be capped at 75 percent of the total charger cost. Other special conditions
117 may include, but are not limited to, the following:

118 i. Customers must submit a PEV Program Administrator approved post-
119 purchase application and meet all PEV Program requirements.

120 ii. Incentives will be available on a first come, first serve basis with an
121 annual cap.

122 iii. The Company and its agents reserve the right to inspect installations.

123 • *DC Fast Charger Prescriptive Incentive* - This measure will promote new
124 DC Fast Charger infrastructure across Utah. The Company is proposing to
125 require DC Fast Chargers to be made available for public use and to require that
126 charger data be made available to the Company to be eligible for this incentive.
127 The Company proposes to have a maximum incentive amount of “up to”
128 \$30,000 per charger for flexibility to adjust to the market, with an initial
129 offering of \$20,000 per charger when the PEV Program becomes effective, as
130 this amount is assumed to drive participation. Incentives will be capped at up
131 to 75 percent of the total charger and installation costs. Special conditions
132 regarding this incentive include, but are not limited to, the following:

133 i. To be eligible, customers must submit a PEV Program
134 Administrator approved application(s), provide all required
135 documentation, and receive pre-approval.

- 136 ii. Equipment purchased or installed prior to receipt of the
137 Company's pre-approval may not be eligible for incentives.
- 138 iii. Pre-approval criteria may include, but is not limited to:
- 139 a. Location variables such as proximity to other DC Fast
140 Chargers;
- 141 b. Overall benefits to the public;
- 142 c. Costs of project and incentive amount;
- 143 d. Technology being used;
- 144 e. Consent to provide charger usage data;
- 145 f. Availability to the public; and
- 146 g. Number of chargers and per project caps.
- 147 iv. Incentives will be available on a first come, first serve basis with
148 an annual cap.
- 149 v. The Company and its agents reserve the right to inspect
150 installations.
- 151 • *Grant-Based Custom Projects and Partnerships* - This measure will allow
152 customers to submit applications for a specific project or partnership that will
153 support PEV infrastructure. Special conditions include, but are not limited to,
154 the following:
- 155 i. To be eligible, customers must submit a PEV Program Administrator
156 approved application(s), provide all required documentation, and go
157 through a selection process.
- 158 ii. The selection process may include, but is not limited to:

- 159 a. Location variables such as proximity to other charging
160 infrastructure;
- 161 b. Overall benefits to the public;
- 162 c. Costs of project and incentive amount;
- 163 d. Technology being used;
- 164 e. Consent to provide charger usage data;
- 165 f. Availability to the public;
- 166 g. Matching funds;
- 167 h. Innovative partnerships and projects that support plug-in electric
168 vehicle infrastructure and education; and
- 169 i. Development of DC fast charging corridors.
- 170 iii. Custom projects may be selected on a quarterly basis and will be limited
171 to available funding.
- 172 iv. The Company and its agents reserve the right to inspect installations.
- 173 v. Participants with new construction may submit an application for pre-
174 approval, but will be held to all applicable timelines.

175 To manage the annual budget of \$2 million, the Company proposes to make
176 non-residential AC Level 2 Charger and DC Fast Charger incentives available up to the
177 cap listed in Table 1 below through September 30th annually and then re-allocate any
178 remaining funds from those measures to Grant-Based Custom Projects and
179 Partnerships. Customers may still submit applications for AC Level 2 and DC Fast
180 Chargers after September 30th, however, applications at that point may be considered
181 as part of the subsequent PEV Program year and associated available funds.

182 Table 1 below sets forth the Company’s estimated budget for the first year of
 183 the PEV Program.

Table 1 - Annual Incentive Caps and Estimated 2017 Budget

PEV Program Year	Incentive Measure	Annual Incentive Caps	Administrative/Outreach & Awareness Costs	Total
2017	Time of Use Pilot Program	\$200,000*	Up to \$500,000*	
	Non-Residential AC Level 2 Chargers	\$400,000*		
	DC Fast Chargers	\$400,000*		
	Grant-based custom projects and partnerships	\$500,000**		
Total		\$1,500,000	\$500,000	\$2,000,000

*This is the maximum amount of funds that may be spent annually. A minimum of \$100,000 will be allocated to outreach and awareness.

**After September 30th each year, any remaining funds below the maximum annual spending limits from Outreach and Awareness costs, as well as Non-Residential AC Level 2 and DC Fast Charger incentives, may be re-allocated to Grant-based custom projects and partnerships, increasing its incentive cap for the calendar year.

184 Given that this is a pilot program, funding allocations from Table 1 above are
 185 subject to change. As the Company gains more experience with the PEV Program, it will
 186 become more apparent where allocations should be targeted to benefit our customers the
 187 most. The Company will adjust funding for incentives and outreach as the PEV Program
 188 progresses and will file for Commission approval to remove or add measures as necessary.

189 **CONCLUSION**

190 **Q. Please summarize the proposal for the Plug-in Electric Vehicle Pilot Program**
 191 **contained in this Application.**

192 A. This program is designed to promote Time of Use rates and customer choice in PEV
 193 charging equipment infrastructure across the State of Utah. Additional program details
 194 are included in the proposed tariff sheets, included as Exhibit RMP____(WJC-1) to my
 195 direct testimony.

196 **Q. What benefits will the Plug-in Electric Vehicle Pilot Program provide to**
197 **customers, the Company, and the state of Utah?**

198 A. The program will increase PEV charging infrastructure throughout Utah, and increase
199 information on customer adoption of this technology and its impact on the electric grid
200 and pricing designs. Building PEV infrastructure will eliminate barriers to the adoption
201 of PEVs, such as range anxiety. PEVs also have a significant emissions benefit over
202 petroleum vehicles and will provide a real benefit to improving air quality along the
203 Wasatch Front.

204 **Q. In your opinion, is the Company's Plug-in Electric Vehicle Pilot Program**
205 **consistent with STEP and in the interest of Rocky Mountain Power's customers?**

206 A. Yes. Section 54-20-103(1) states:

207 The commission shall, before July 1, 2017, authorize a large-scale electric
208 utility to establish a program that promotes customer choice in electric vehicle
209 charging equipment and service that includes: (a) an incentive to a large-scale
210 electric utility customer to install or provide electric vehicle infrastructure; (b)
211 time of use pricing for electric vehicle charging; (c) any measure that the
212 commission determines is in the public interest that incentivizes the competitive
213 deployment of electric vehicle charging infrastructure.

214 The proposed PEV Program is consistent with this language.

215 **Q. What is your recommendation?**

216 A. I respectfully recommend that the Commission approve the Plug-in Electric Vehicle
217 Incentive Pilot Program as described in my testimony and in the attached tariff sheets
218 in Exhibit RMP__(WJC-1), effective July 1, 2017.

219 **Q. Does this conclude your direct testimony?**

220 A. Yes.