

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

Rebuttal Testimony of William J. Comeau

April 2017

1 **Q. Are you the same William J. Comeau who submitted direct testimony in Phase**
2 **Three of this proceeding on behalf of the Company?**

3 A. Yes.

4 **PURPOSE OF TESTIMONY**

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

6 A. The purpose of my rebuttal testimony is to respond to and/or rebut issues regarding the
7 proposed Plug-in Electric Vehicle (“PEV”) Program raised by Utah Office of Consumer
8 Services witness Ms. Cheryl Murray, Utah Clean Energy and Southwest Energy
9 Efficiency Project witness Mr. Kevin Emerson, and ChargePoint witness Mr. James
10 Ellis. Specifically, my testimony will address recommended changes to the proposed
11 Schedule 120, outreach and education concerns, and future adjustments to annual
12 incentive caps raised by Ms. Murray, incentive offering and budget recommendations
13 raised by Mr. Emerson, and eligible equipment qualifications raised by Mr. Ellis.
14 Company witness Mr. Robert M. Meredith is submitting rebuttal testimony to respond
15 to parties regarding the residential time-of-use pilot, Schedule 2E.

16 **SCHEDULE 120 REVISIONS**

17 **Q. Ms. Murray suggests minor language modifications to Schedule 120. Does the**
18 **Company agree with some of these suggestions?**

19 A. Yes, the Company agrees with three of the four suggestions. Ms. Murray suggests the
20 following changes be made to Schedule 120:

21 a) Revise the title of Table 1 in Sheet 120.1 to better capture the range of measures
22 eligible for incentives;

- 23 b) Revise Special Conditions 2 and 4 under Non-Residential AC Level 2 Charger
24 and DC Fast Charger, respectively, to clarify incentives will be available on a
25 first come first served basis;
- 26 c) Revise Footnote 1 on Sheet 120.1 to clarify time of use load research
27 participants “are eligible” rather than “may be eligible” for a separate \$200
28 payment; and
- 29 d) Split the \$200 incentive for time of use participants in Schedule 2E with \$100
30 paid upon signing up and \$100 paid upon completion of the customer survey.

31 The Company agrees with modifications a, b, and c above and has included
32 revisions to Sheet Nos. 120.1 and 120.2 to address them and other modifications,
33 attached as Exhibit RMP____(WJC-1R). It should be noted that Footnote 1 has been
34 removed from Sheet 120.1 and instead been incorporated under the Time of Use Rate
35 Special Conditions on Sheet 120.2. The Company believes that modification d is an
36 unnecessary complication. Splitting the incentive as Ms. Murray suggests will create
37 additional administrative costs to track when each participant enrolls in time of use
38 rates on Schedule 2E and when the same participant completes the customer survey. It
39 may also create confusion and require additional customer outreach materials to
40 adequately explain how and when participants will receive incentive payments. The
41 Company believes simplifying the process will result in greater participation, and also
42 expects to obtain enough customer surveys to be statistically relevant without allocating
43 incentive funds to that end.

44 **OUTREACH AND EDUCATION & ANNUAL INCENTIVE CAPS**

45 **Q. Ms. Murray suggests the minimum \$100,000 allocated to outreach and education,**
46 **as part of the \$500,000 overall administrative budget, may be inadequate to**
47 **launch a successful outreach and education campaign. Does the Company share**
48 **this concern?**

49 A. No. The proposed budget takes into consideration that the first program year (2017)
50 consists of only 6 months, assuming a program start date of July 1, 2017. Based on our
51 experience launching new programs, the Company believes \$500,000, which is 25
52 percent of the total annual budget, is sufficient to successfully launch the PEV Program.
53 Actual spend for outreach and education is dependent on the results of the Program
54 Administrator Request for Proposals and final contract, but will not be less than
55 \$100,000.

56 **Q. Ms. Murray suggests that additional technical conferences be required of the**
57 **Company to provide specific information regarding its outreach and education**
58 **plans as they are developed. Does the Company agree with this suggestion?**

59 A. No. The Company believes mandatory technical conferences for outreach and
60 education are not needed for a successful 2017 launch of the PEV Program. The
61 Company will provide annual reports documenting the results of the PEV Program,
62 including marketing efforts, the first of which will be provided the first part of 2018.
63 The annual report will include improvements needed for the PEV Program, including
64 marketing and outreach. If unforeseen issues occur that will prevent the PEV Program
65 from being successful we will meet with stakeholders and file with the Commission,

66 as needed. In addition, the Company will respond to any stakeholder request for an
67 update on current marketing efforts and materials.

68 **Q. Does the Company have a strategy for marketing and outreach?**

69 A. Yes. Marketing and outreach during the first two years will include:

- 70 • A targeted approach to reach the approximate 2,500 PEV owners in Utah to:
- 71 1. Obtain participation in the TOU Pilot;
- 72 2. Obtain participation in the TOU Load Research Study; and
- 73 3. Educate all PEV owners on the need to charge during off-peak time
- 74 periods for the purpose of changing their behavior to charge during off-
- 75 peak.
- 76 • A robust online resource website to provide customers information about
- 77 electric vehicles and benefits of charging during off-peak times.
- 78 • Scoping the benefits and cost of an online app for PEV owners. The main
- 79 purpose would be to facilitate charging behavior during off-peak times.
- 80 • Direct business marketing to create awareness for the PEV charging
- 81 infrastructure incentives, with a focus on obtaining participation in the PEV
- 82 Program.

83 The strategy for future years will be driven from the lessons learned and the evolving
84 needs of the PEV Program and customers.

85 **INCENTIVE OFFERINGS AND BUDGET**

86 **Q. Mr. Emerson recommends that the Company reallocate \$50,000 from the Grant-**
87 **Based Custom Projects and Partnerships category to a new Residential Level 2**
88 **EV Charger incentive category, with the incentive set at \$500 per charger. Does**
89 **the Company agree with this recommendation?**

90 A. No. The Company believes it is more beneficial to promote participation in time of use
91 rates to incentivize PEV charging during off-peak periods than to incentive residential
92 AC Level 2 chargers. Customers may choose to use the incentive they receive from
93 participating in time of use rates towards the purchase of an AC Level 2 charger.

94 **Q. Mr. Emerson recommends increasing the incentive cap for Non-Residential Level**
95 **2 chargers to \$4,000 for single port, and \$7,000 for dual port stations. Does the**
96 **Company agree with this recommendation?**

97 A. Yes. As shown in Exhibit RMP___(WJC-1R), Table 1 has been modified to include
98 separate incentives for single and multi-port chargers. The maximum up to amounts for
99 Non-Residential AC Level 2 Chargers have been increased to \$4,000 per single port
100 and \$7,000 per multi-port, up to 75 percent of total charger cost, as recommended by
101 Mr. Emerson. The initially offered amount the Company will provide for single port
102 chargers will be increased to \$2,500, and \$3,500 for multi-port chargers. If these
103 incentive amounts need to be adjusted based on participation levels, the Company will
104 do so through a 45-day notice posted to its website.

105 **Q. Mr. Emerson recommends increasing the incentive cap for DC Fast Chargers to**
106 **\$45,000. Does the Company agree with this recommendation?**

107 A. Yes. Similar to Non-Residential AC Level 2 Chargers, and as shown in Exhibit
108 RMP___(WJC-1R), DC Fast Chargers have been defined by single vs. multi-port. The
109 single port maximum incentive has been increased to \$45,000 and multi-port maximum
110 incentive has been set at \$63,000, up to 75 percent of total charger and installation
111 costs. The initially offered incentive amount for single port chargers will be increased
112 to \$30,000, and \$42,000 for multi-port chargers. If these incentive amounts need to be
113 adjusted based on participation levels and budgets, the Company will do so through a
114 45-day notice posted to its website.

115 **Q. Mr. Emerson recommends breaking out a separate multi-family offering with**
116 **higher incentive offerings than the Non-Residential AC Level 2 Charger offering.**
117 **Does the Company agree with this recommendation?**

118 A. No. The multi-family sector is adequately addressed by being allowed to participate in
119 all the Non-Residential offerings, such as AC Level 2, DC Fast Chargers, and Grant-
120 based Custom Project offerings.

121 **Q. Mr. Emerson expresses concerns about re-allocating unused funds after**
122 **September 30th into the Grant-based Custom Projects and Partnerships category,**
123 **only allowing for 3 months in the first year of the PEV Program to provide the full**
124 **spectrum of offerings, assuming an effective date of July 1, 2017. Does the**
125 **Company share these concerns?**

126 A. No. To clarify, after September 30th each year, the Non-Residential AC Level 2 and DC
127 Fast Charger incentives will still be available to customers, but the funds at that point

128 will be part of the subsequent year's budget. For example, as of October 1, 2017, all
129 applications received for Non-Residential AC Level 2 and DC Fast Chargers going
130 forward will be counted towards the budget for 2018. In essence, the PEV Program
131 prescriptive incentives budget will follow an October 1st through September 30th
132 program year, while Grant-based custom projects and partnerships will follow a
133 January 1st through December 31st program year. Accounting for the PEV Program in
134 this manner will help ensure funding for the PEV Program is used efficiently, and avoid
135 the unnecessary loss of funds due to the use-it-or-lose-it nature of the PEV Program's
136 funding.

137 **Q. Mr. Ellis recommended eliminating the fund re-allocation after September 30th**
138 **each year, and instead rolling over remaining funds to the same budget category**
139 **in the following year. Does the Company agree with this recommendation?**

140 A. No. Funds allocated to the PEV Program are on an annual use-it-or-lose-it basis. The
141 PEV Program may spend up to \$2 million per year, with any remaining funds being
142 forfeited and ineligible to be rolled over to the subsequent calendar year. The purpose
143 of the fund re-allocation is to use funds efficiently.

144 **Q. Mr. Emerson provides an alternative proposal to Table 1 from your direct**
145 **testimony. Does the Company agree with the alternative proposal?**

146 A. No. Due to the limited budget for the PEV Program, the Company believes the overall
147 package for the PEV Program, including Table 1 below, is consistent with U.C.A. §54-
148 20-103(1), promoting customer choice in electric vehicle charging equipment and
149 provides all eligible customers an option for incentives.

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	\$200,000*	Up to \$500,000*	
	Non-Residential AC	\$400,000*		
	DC Fast Chargers	\$400,000*		
	Grant-based custom	\$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 identified in Table 1 above, may be re-allocated at the Company's discretion based on participation to Grant-based custom projects and partnerships, increasing its incentive cap for the calendar year.

150 **Q. Mr. Emerson recommends that chargers receiving incentives through the PEV**
 151 **Program meet all industry-accepted standards for EV charger safety and**
 152 **performance, published by entities such as Underwriters Laboratories. Does the**
 153 **Company agree with this recommendation?**

154 A. Yes. The Company intends to require all electric vehicle charging equipment to be UL
 155 certified. As PEV charging technology and standards evolve, the Company will adjust
 156 standards, as appropriate.

157 **ELIGIBLE EQUIPMENT QUALIFICATIONS**

158 **Q. Mr. Ellis recommends the PEV Program only incentivize charging stations that**
 159 **can communicate to provide data and load management tools. Does the Company**
 160 **agree with this recommendation?**

161 A. No. If the PEV Program only incentivized communicating chargers we would not be
 162 promoting customer choice with plug-in electric vehicle charging infrastructure. The
 163 Company believes both communicating and non-communicating Level 2 chargers are
 164 part of the overall electric vehicle charging infrastructure solution. As noted in the

165 proposed Schedule 120, projects receiving incentives for DC fast chargers and custom
166 projects will be required to provide the Company access to charging data.

167 **Q. Mr. Ellis recommends the Company be required to work with the electric vehicle**
168 **supply equipment ("EVSE") industry and other stakeholders on the development**
169 **of a common qualification framework. Does the Company agree with this**
170 **recommendation?**

171 A. No. The Company is in the process of finalizing the PEV Program administrator
172 request-for-proposal. The PEV Program administrator will be an EVSE expert and will
173 be responsible for continually improving the PEV Program to ensure program targets
174 are being met, which includes consulting with the electric vehicle industry.

175 **Q. Does the Company have any other revisions or recommendations at this time for**
176 **the PEV Program other than those described in this rebuttal testimony?**

177 A. No.

178 **Q. Does this conclude your rebuttal testimony?**

179 A. Yes.