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April 1, 2011

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1461

Enclosed for filing in the above-referenced docket are an original and five copies of the Closing Comments of Idaho Power Company.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo
Legal Assistant

cc: Service List

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in
3 Docket UM 1461 on the following named person(s) on the date indicated below by email
4 and/or first-class mail addressed to said person(s) at his or her last-known address(es)
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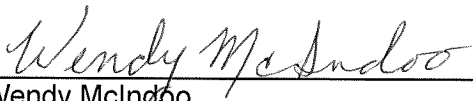
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DATED: April 1, 2011



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1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1461**

4 In the Matter of

5 PUBLIC UTILITY COMMISSION OF
6 OREGON,

7 Investigation of matters related to electric
8 vehicle charging.

**Closing Comments of Idaho Power
Company**

9
10 Idaho Power Company ("Idaho Power" or "Company") submits the following Closing
11 Comments to the Public Utility Commission of Oregon ("Commission") in response to
12 issues raised in the comments filed on February 10, 2011, and at the workshop held on
13 March 2, 2011.

14 **I. INTRODUCTION**

15 After reviewing the two rounds of comments and attending two workshops in this
16 docket, the Company's fundamental position remains unchanged. The Company believes
17 that electric vehicles ("EVs") represent a unique and potentially significant opportunity for
18 utilities and customers alike. However, at this time it is premature to adopt novel and
19 untested rate schedules for EV charging because there is insufficient data to properly
20 design a rate schedule that reflects the actual costs to serve EV charging. Therefore, the
21 Company opposes the proposal for the creation of a separate EV rate class at this time.
22 This is not to say that the Company believes this should always be the case; rather as the
23 market develops and the results of various pilot projects, such as the EV Project, emerge
24 there may be sufficient data in the future to both justify the creation of a separate rate
25 class and develop a proper cost of service rate for that class. Moreover, because the

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1 market is still in its infancy, the Commission should remain flexible and not prematurely
2 foreclose certain market developments or otherwise stifle EV adoption.

3 **II. DISCUSSION**

4 **A. The EV Market is Still Developing.**

5 The Company believes that the following facts should inform the Commission's
6 analysis and ultimate decision with respect to the issues raised in this docket.

7 As parties acknowledge, EV market penetration is likely to be small for the
8 foreseeable future. Staff concluded that in the first few years, "the EV population is
9 expected to grow slowly,"¹ and that a 5 percent market penetration by 2020 is optimistic.²
10 Thus, Staff concluded: "All projections by ODOT, ODOE and the Electrification Coalition
11 suggest that the pace of EV adoption will be gradual enough for utilities and public utility
12 commissions to learn from experience."³

13 The slow pace of EV adoption is likely to be even slower in Idaho Power's service
14 territory. Indeed, the EV Project does not extend to eastern Oregon and therefore even
15 the 900 EVs that are a part of that pilot will be outside the Company's service territory.⁴
16 Staff's comments also point out that "market research predicts EV's will likely concentrate
17 in certain zip codes."⁵ It is unlikely that these zip codes will be in Idaho Power's service
18 territory. Therefore, it is reasonable to assume that for Idaho Power EV market
19 penetration will be even lower than it will be elsewhere. Thus, if a separate rate class is
20 established it will be a numerically small class.

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22 ¹ Staff's Response at 14.

23 ² Staff's Opening Comments at 10.

24 ³ Staff's Response to Commission Bench Request at 23 (hereinafter "Staff's Response").

25 ⁴ Staff's Response at 14.

26 ⁵ Staff's Opening Comments at 10-11.

1 And while the majority of market analysis has focused on total market adoption, the
2 uncertainty regarding adoption rates by customer segment has been nearly absent. Even
3 Staff noted in their comments that since this docket began, the EV industry has refocused
4 marketing efforts toward the government and commercial fleet sectors.⁶ This shift
5 demonstrates the uncertainty in market analysis and the resulting uncertainty regarding
6 differential sector charging behavior, load impact, infrastructure requirements, and rate
7 design.

8 With respect to load impacts, Idaho Power forecasts an immaterial impact through
9 2020 for its entire service territory.⁷ And Staff acknowledges that “EV penetration may
10 reach a level where it has a measurable impact on the utility’s load profile,” but “no one
11 can predict when this might happen.”⁸ Indeed, the Oregon Department of Energy’s
12 (“ODOE”) analysis concluded that the energy usage pattern of an EV is very similar to that
13 of a home spa.⁹

14 In addition, as ODOE pointed out, EV-related technology is still developing¹⁰ and the
15 full capability of current technology is not necessarily known or capable of implementation.
16 For instance, the Citizens Utility Board of Oregon (“CUB”) pointed out that EV battery
17 manufacturers have been reluctant to allow their products to be used for energy storage.¹¹

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20 ⁶ Staff’s Response at 1.
21 ⁷ Comments of Idaho Power Company Responding to Opening Comments and Bench Request at
22 13.
23 ⁸ Staff’s Opening Comment at 10.
24 ⁹ Oregon Department of Energy’s Comments at 5.
25 ¹⁰ Oregon Department of Energy’s Comments at 4.
26 ¹¹ See CUB’s Response to Opening Comments and Bench Request at 8 (hereinafter “CUB’s
Response”).

1 And both usage and charging patterns are unknown at this time. However, thanks to
2 pilot projects both here and elsewhere, we will have significantly more knowledge over the
3 next several years.

4 Moreover, the price to purchase these cars is significant but the price to drive them is
5 not. Indeed, Staff calculates that the charging costs to drive 1,000 miles in an EV are
6 approximately \$20—approximately 2 cents per mile.¹² Thus, without any changes to the
7 current rate schedules, these cars are still cost-effective for their drivers.

8 Finally, it is important to emphasize that the Commission can revisit the principles
9 adopted in this order over time as market penetration increases, usage patterns become
10 better defined, and technology matures. In other words, as actual EV data becomes
11 available, informed decisions can be made at that time based on that data.

12 Idaho Power anticipates benefits from off-peak charging of EVs as market
13 penetration increases and technology matures. So the Company wants to ensure there
14 are not substantial barriers to potential EV drivers that may hinder increased market
15 penetration. The Company believes that several proposals in this docket, such as
16 mandatory separate rate schedules, may do just that.

17 **B. The Commission Should Not Foreclose Utility Ownership of EV Charging**
18 **Infrastructure.**

19 As noted by Staff, because the EV charging market is in its infancy and it is unclear
20 how it will develop the Commission should not prematurely foreclose future options.¹³ The
21 Company supports this proposition and therefore urges the Commission to not adopt a
22 policy that forecloses utility ownership of EV charging infrastructure. Although it is unclear

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24 ¹² Staff's Opening Comments at 11. This assumes a price of 8 cents/kWh. Similarly, the
25 Department of Energy's analysis suggests that a homeowner charging 80 percent at home and
driving 12,000 miles per year would pay approximately \$240 per year for EV charging. Oregon
Department of Energy's Comments at 5. ODOE's analysis was based on a price of 10 cents/kWh.

26 ¹³ Staff's Opening Comments at 9.

1 the precise nature of this ownership, or whether it will occur at all, the Commission should
2 allow utilities to participate in the market and recover their costs through rates if such costs
3 are (1) prudently incurred; (2) used to serve utility customers; and (3) reasonably
4 necessary to extend EV charging service to utility customers.

5 Staff also supports allowing utilities to participate in this market provided they can
6 demonstrate (1) the investment is prudent; (2) there is no likelihood that a third party or
7 unregulated affiliate could provide the same services at the same locations; (3) charging
8 infrastructure in the particular location is essential for EV adoption; and (4) the utility
9 establishes a separate EV rate class so costs are not assigned to all customers.¹⁴ There
10 is significant overlap between these criteria and those proposed by the Company and the
11 Company agrees that Staff's proposed criteria are generally reasonable. However, the
12 Company believes that it is not absolutely necessary to establish a separate rate class, as
13 in the example of municipal street lighting described in PacifiCorp's Response to Bench
14 Request and Opening Comments.¹⁵

15 As discussed at the workshop and in Idaho Power's comments, the potential models
16 for utility ownership of EV charging infrastructure are all hypothetical at this time.
17 Therefore, the Commission should wait until a specific factual scenario arises before
18 making a definitive finding. In this docket the Commission need not adopt specific,
19 definitive guidelines because the actual scenario presented in the future may be one that
20 is not even contemplated by the parties at this time. Thus, the Company believes that its
21 more general guidelines are more appropriate at this time.

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25 ¹⁴ Staff's Response at 9.

26 ¹⁵ PacifiCorp's Response to Opening Comments and Bench Request at 2-3.

1 **C. It is Too Early To Adopt EV-Specific Rates and Rate Designs.**

2 Idaho Power's position with respect to these issues is unchanged. The Company
3 maintains that it is simply too early to create a separate rate class for EV charging.
4 Rather, a whole-house/business time-of-use ("TOU") rate schedule should be made
5 available to EV drivers to encourage off-peak charging.¹⁶ The Company also continues to
6 believe that separate metering or submetering is unnecessary and will needlessly drive up
7 costs. As noted above, these issues can be re-examined in the future when there is better
8 data to analyze the impact of creating a separate rate class. As Staff noted, EV adoption
9 will be gradual enough that the Commission can learn from experience before making
10 significant rate changes, and the Company urges the Commission do just that.¹⁷

11 **1. Idaho Power Supports TOU Rates for the Whole House.**

12 In lieu of creating a wholly new rate class with rates based upon conjecture, Idaho
13 Power reiterates its support for the development of an optional TOU rate that can be
14 utilized by EV drivers to encourage off-peak charging. TOU rates send price signals
15 based upon the individual utility system costs, *i.e.*, system peaks and resource mixes
16 specific to each utility. Although Idaho Power does not currently have TOU rates, it
17 anticipates making this option available to customers in the near future and believes that
18 encouraging its adoption by EV drivers provides meaningful price signals without
19 compromising the Company's ability to recover its prudently incurred costs or unduly
20 shifting costs to non-EV drivers.

21 Importantly, the adoption of TOU rates should not be mandatory for EV drivers.
22 However, if an EV driver chooses this option, it should be on a whole house/business

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24 ¹⁶ As referenced in previous comments, the Company does not currently offer TOU rates. The
25 Company is, however, in the process of developing both the technological capability, *e.g.* full
Advance Metering Infrastructure roll out, and the necessary back office systems to implement TOU
rates. The Company anticipates offering these rates by 2013.

26 ¹⁷ Staff's Response at 23.

1 basis. This minimizes the costs associated with separate metering, discussed in more
2 detail below.

3 **2. There Should Be No Separate Rate Class**

4 There are two key reasons the Company believes it is too early to create a separate
5 rate class. *First*, there is simply not enough market penetration to justify the creation of a
6 whole new customer class. As noted above, optimistic projections suggest that by 2020
7 EVs may occupy a mere 5 percent of the market. Presumably, in Idaho Power's rural
8 eastern Oregon service territory this number will be significantly less and it is most
9 definitely significantly less today.¹⁸ Therefore, for Idaho Power it makes little sense to
10 require the creation of a wholly separate rate class (and incur the administrative costs to
11 establish the rates and design) when there is little evidence that more than a handful of
12 customers will qualify for the class for the foreseeable future.

13 *Second*, there is insufficient data to actually determine the costs to serve EV drivers.
14 To perform a meaningful cost of service study, the Company would need extensive data,
15 including data on market penetration, geographic distribution of EVs, usage patterns, and
16 peak usage. Although parties could estimate these values, reliable data sufficient to
17 develop rates simply does not exist. Indeed, no party's comments have any substantive
18 analysis of the actual costs to serve this proposed class. Idaho Power's primary objective
19 when setting rates is ensuring that rates are based as closely as possible on the actual
20 costs to serve the particular customer or provide the particular service. This ensures that
21 costs are recovered from those customers for whom the costs are incurred and results in
22 overall rate structures that are fair, helps reduce intra- and inter-class subsidies, and
23 sends appropriate price signals to encourage using energy efficiently.

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25 ¹⁸ Oregon's Department of Transportation does not release EV data so it is unclear how to determine
26 the precise number of EVs in Idaho Power's territory. Nonetheless, the Company is confident that the
adoption rate will be lower than elsewhere in Oregon, e.g. the Willamette Valley.

1 Establishing rates now, without sufficient knowledge, results in what ECOTality
2 correctly characterized as “experimental” rates that will require redesign in the future
3 based upon “actual market experience.”¹⁹ In comments, ECOTality stated that it:

4 strongly encourages the Commission to redesign PEV rates
5 after establishing basic principles and examining early market
6 data. Before revisiting existing PEV rates, the Commission
should ensure that it has a sufficient understanding of PEV
usage and charging by early adopters.²⁰

7 Idaho Power agrees that the Commission should ensure it has a sufficient understanding
8 of EV usage and charging. However, the Company believes that the Commission should
9 have this information *before it establishes rates in the first instance*, not before it redesigns
10 rates that were first established based upon conjecture and speculation. The Commission
11 should ensure it has sufficient understanding of usage and charging in the first instance
12 because poorly designed experimental rates may have a very negative impact on
13 customers and may very well deter EV adoption.

14 Poorly designed rates may also lead to uncertainty in the marketplace. Designing an
15 experimental rate that will by necessity be redesigned once “early market data is collected
16 and analyzed”²¹ does not provide certainty for customers and businesses contemplating
17 purchasing an EV or entering the charging market. It is more reasonable to design rates
18 in the first instance once this data is collected and analyzed. Only then will it be clear that
19 a separate rate class is warranted and only then will the Commission be able to establish
20 rates for that class based on the cost of service.

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23 ¹⁹ ECOTality’s Combined Response to Opening Comments and Bench Request at 12 (“ . . . we
24 encourage the Commission in the near term to develop a set of principles for rate design, and work
with the utilities to test and improve on innovative experimental rate designs.”) (hereinafter
“ECOTality’s Response”).

25 ²⁰ ECOTality’s Response at 12.

26 ²¹ ECOTality’s Response at 17.

1 The consequences of a poorly designed rate are not insignificant. If the rates are too
2 high and exceed the actual cost of service, it will present a potentially significant barrier to
3 EV adoption and result in the EV class subsidizing others. On the other hand, if the rates
4 are too low and underestimate the actual cost of service, it will result in the utility being
5 unable to recover its prudently incurred costs to serve EV customers. Thus, if the
6 Commission requires a separate rate class and a corresponding experimental rate, it
7 should also provide the utilities with a mechanism to allow recovery in rates from all
8 customers (or a true-up within the EV class) of the difference between the actual cost of
9 service for EV drivers and the experimental EV class rates. Or, the Commission can
10 simply choose to not require a separate class until such time as there is sufficient data to
11 warrant it.

12 Staff argued that the costs of the separate EV class should be spread to all
13 customers because the EV class is too small to bear the start up costs and EVs provide
14 benefits to all customers.²² This first argument suggests that it is premature to develop a
15 separate class at all if its members cannot bear these costs. And although EVs *may*
16 provide system-wide benefits in the future, they will not do so today. Indeed, ECOTality
17 acknowledged this when it proposed that,

18 [a]t some point, equity may dictate that EV users bear some of
19 the costs of a separate rate schedule. However, the
20 cost/benefit analysis should be left until such time as the
 systemic, environmental and societal impact of a separate rate
 can be better assessed.²³

21 In other words, the system-wide benefits are unknown now, but rather than waiting until
22 they are known parties are urging the Commission to adopt rates and spread costs to all

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24 ²² Staff's Response at 14-15.

25 ²³ ECOTality's Response at 17. Notably, earlier in ECOTality's comments it stated that it "agrees that
26 in the early market there should be no undue shifting of EV related costs onto non-participating
ratepayers." ECOTality's Response at 5.

1 customers in anticipation of benefits. Even the benefit of off-peak EV charging, which
2 does exist today, is insignificant because of the small number of EV drivers.²⁴ Spreading
3 these costs to all customers also raises questions of inter-generational equity because
4 Staff is asking current customers to subsidize a specific rate class on the assumption that
5 at some undefined future time that rate class may provide benefits to future customers.
6 This violates the matching principle because the benefits will occur after the costs are
7 incurred.

8 **3. EV Drivers Should Not Be Separately Metered.**

9 Idaho Power continues to believe that a separate meter is unnecessary at this time.²⁵
10 Although it may limit the ability of parties to gather usage data on EV drivers, the costs of
11 implementing a separate metering system will likely be a deterrent to potential EV drivers,
12 who should bear the cost associated with separate metering if it is required.²⁶ As CUB
13 pointed out, “[t]he cost of installing a separate meter for each household that purchases an
14 EV is, if not prohibitive, at least a hindrance to widespread EV adoption.”²⁷ ECOtality
15 concurred, stating that separate meters, “bring[] significant financial burden and logistics
16 complexity and delay which may increase adoption barriers to EVs.”²⁸ In addition to the
17 costs of the meter and additional wiring, a separate meter would, of course, result in other
18 additional service related costs such as meter reading and billing.

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20 ²⁴ Staff’s Response at 14 (“ . . . for the first few years, the EV population is expected to grow
21 slowly.”).

22 ²⁵ This issue overlaps somewhat with the discussion of the creation of a separate rate schedule.
23 However, as demonstrated by Staff’s proposal, the creation of a separate rate schedule does not
necessarily require a separate meter if the customer’s whole house is required to be on TOU rates.

24 ²⁶ See ECOtality’s Response at 6 (“In the rate option where an EV customer may be required to use
a separate meter, the customer should bear the cost for the dual-meter set up.”).

25 ²⁷ CUB’s Response at 4.

26 ²⁸ ECOtality’s Response at 6.

1 Submetering brings its own set of problems and should likewise be rejected. Idaho
2 Power does not currently use submetering for any revenue billing for any customers. As
3 discussed in Idaho Power's previous comments, submetering requires manual billing
4 calculations that will dramatically increase the administrative back office costs of billing EV
5 drivers. In the case of the application of TOU rates, a manual calculation would be
6 required for each time block, compounding the calculations and time requirements. Again,
7 this means that either those costs will be prohibitive to EV drivers or the costs will be
8 unfairly allocated to all customers.

9 For industrial and large commercial customers, a separate meter (and separate EV
10 rate class also) is of particular concern because of the nature of delivery to these
11 customers. For instance, some industrial and large commercial customers take power at
12 a higher voltage than would be required to separately meter an on-site charging station.
13 Thus, if these customers, *e.g.*, a grocery store on a large commercial schedule, wanted to
14 put EV chargers in their parking lot, they may be required to pay for a separate line drop to
15 facilitate the separate meter for the EV charger. This results in substantial costs for these
16 types of customers if they are required to separately meter EV charging. These costs
17 would have to be borne by the individual customers desiring EV chargers on their
18 premises.

19 Several parties raise the possibility of using embedded meters in the vehicles
20 themselves as a revenue meter for EV drivers.²⁹ Based on the limited record with respect
21 to this issue in this docket, the Company urges the Commission to defer this issue to
22 future dockets where it can be explored in detail. Moreover, allowing non-utility owned
23 meters are likely prohibited by Oregon statutes and current Commission rules.³⁰

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25 ²⁹ See *e.g.*, Staff's Response at 19.

26 ³⁰ See *e.g.*, ORS 757.250 ("every public utility is required to carry into effect all orders issued by the commission relative" to the accuracy and security of all meters); ORS 757.320(3) (public utilities are

1 **4. The Commission Should Not Require Mandatory EV Rates.**

2 Staff's rate design proposal for residential and small commercial customers' calls for:
3 (1) the creation of a mandatory separate rate class with TOU rates for all EV drivers, or (2)
4 a mandatory TOU rate for the EV charging, while the rest of the house/business would
5 remain on its current rate schedule.³¹ Thus, under either proposal, customers driving EVs
6 would be required to move to a new and different rate schedule.

7 The first problem with this proposal is that it will be difficult or impossible to enforce.
8 As pointed out in the Company's previous comments, Idaho Power has no way of knowing
9 when or if a customer purchases an EV. Therefore, the utility has no way of enforcing
10 these mandatory rates. If the result of these rates is an overall increase to a customer's
11 monthly bill there is a strong disincentive to disclose EV charging. Thus, any potential
12 benefits may be lost.

13 More importantly, if EV drivers are required to move to a separate rate schedule, and
14 potentially obtain a separate meter, it may prove to be a significant barrier to adoption—
15 especially because at this time there is insufficient data to determine the potential impact
16 such a change may have on a monthly utility bill. The Oregon Department of Energy
17 noted that, "Mandatory EV rate schedules for the residential and commercial sectors
18 would be burdensome and could be a barrier to EV adoption, particularly in the residential
19 sector."³² CUB concurred noting that, "some customers may be reluctant to purchase an
20 EV if it means that their entire electric billing structure will need to be altered."³³ The

21 not required to furnish customer appliances "except meters and appliances for measurements of
22 any service"; ORS 757.665 ("Electric meter installation, testing and maintenance shall be
23 performed only by a distribution utility."). See also OAR 860-021-0045 ("electric company shall
24 furnish, own, operation, maintain, and replace the service connections"); OAR 860-023-0010(2)
25 (unless the Commission orders otherwise, utilities must own, maintain, and operate all meters).

24 ³¹ Staff's Response at 20.

25 ³² See Oregon Department of Energy's Comments at 4.

26 ³³ CUB's Response at 5.

1 Company agrees with these assessments and believes that mandatory rates may deter
2 EV adoption.

3 **5. EV Customers Should Not Be Exempt from Demand Charges.**

4 ECOtality requests that the Commission remove the demand charge component
5 from whatever rate schedule is ultimately adopted for EV charging.³⁴ This proposal should
6 be rejected because it is premised on the notion that the current demand charge is not
7 reflective of the actual cost of service. This is untrue. The demand charge included in
8 Idaho Power's tariffs is a cost based charge developed to reflect the costs to the system
9 caused by customer's usage. Demand charges are typically designed to recover all or a
10 portion of the capacity-related costs associated with generation and transmission of
11 electricity as well as all or a portion of the capacity related distribution facilities which
12 includes such things as substations, primary lines and transformers. In short, demand
13 charges are designed to recover the infrastructure costs that are specifically caused by a
14 particular customer or customer class. If the usage patterns of a customer or customer
15 class cause the utility to add capacity in order to serve them, then fairness dictates that
16 class should bear the burden of that cost. Thus, if an EV charger results in usage that
17 would incur a demand charge the customer should pay that demand charge.

18 Waiver of the demand charge for certain customers based on a specific end use also
19 raises potential discrimination concerns because those customers would be treated
20 differently from other similarly situated customers.³⁵ For example, a grocery store that
21 installs an EV charging station that changes its load profile such that the demand charge
22 would apply would be exempt. While another grocery store whose load profile changes

23 ³⁴ ECOtality's Response at 11 and 12.
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25 ³⁵ See ORS 757.325 ("(1) No public utility shall make or give undue or unreasonable preference or
26 advantage to any particular person or locality, or shall subject any particular person or locality to
any undue or unreasonable prejudice or disadvantage in any respect. (2) Any public utility violating
this section is guilty of unjust discrimination.")..

1 such that the demand charge would apply but does not have an EV charging station would
2 have to pay the charges.

3 **D. The Commission Should Reject Staff's Proposed IRP Guidelines.**

4 The Commission should reject Staff's proposed IRP guidelines because this is not
5 the proper forum to adopt general IRP guidelines for flexible resource planning. Notably,
6 the proposed flexible resource guidelines are not even specifically tailored to EVs, they
7 are general guidelines addressing flexible resource planning. If parties wish to propose
8 additional IRP guidelines not necessarily related to EVs or if parties believe that Idaho
9 Power's current IRP methodology fails to account for flexible resources, the proper forum
10 to raise these issues is Idaho Power's IRP docket.

11 **E. There Should Be No Additional Reporting.**

12 The Company believes that the proposals for additional reports are premature and it
13 is unclear if the Company could even provide the information requested. CUB proposes
14 that the Commission require all utilities to report to the Commission within six months of
15 what would be required under its distribution system to allow for EV charging as a variable
16 load to offset intermittent wind.³⁶ It is unclear that this report would be meaningful
17 because of the speculative nature of EV market penetration and usage patterns. Without
18 this information the Company cannot know what technological upgrades would be
19 required to implement this type of smart charging.

20 CUB also asks that the Commission require utilities to gather data and make periodic
21 reports on EV impacts and energy usage patterns.³⁷ Notably, without the separate meter,
22 which CUB and Idaho Power oppose, it is unclear how this data will be obtained.
23 Moreover, it is unlikely that Idaho Power will have significant market penetration in its

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25 ³⁶ CUB's Response at 9; See also Staff's Response at 22.

26 ³⁷ CUB's Response at 8.

1 service territory in the foreseeable future to make such a report meaningful. CUB also
2 wants utilities to include in their report data on the number of registered EVs in their
3 service territory. It is unclear how the Company would obtain this information, but if the
4 information is available to the Company is it likely available to all other parties as well, e.g.
5 by making a request to the Oregon Department of Transportation. Therefore, this
6 information is not unique to the utility.


7 **III. CONCLUSION**

8 Idaho Power supports the Commission's efforts to address the proliferation of EVs in
9 Oregon and supports the removal of potential barriers that may inhibit EV adoption.
10 However, the Company stresses that it is simply too early to adopt specific rate treatment
11 for EVs. Doing so may very well hinder EV adoption by creating unnecessary barriers and
12 result in unreasonable cost shifting to non-EV drivers. Therefore, the Company urges the
13 Commission to defer the adoption of separate rate treatment until such time as sufficient
14 information exists to warrant separate rate treatment and support a cost of service
15 analysis for those rates.

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DATED: April 1, 2011.

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