

Docket: : A.17-06-031 et al.
Exhibit Number : _____
Commissioner : Peterman
Admin. Law Judge : Cooke and Goldberg
ORA Coordinator : Matthew Yunge
:



ORA
OFFICE OF RATEPAYER ADVOCATES



**OFFICE OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PREPARED TESTIMONY
ON
PACIFICORP'S 2017 TRANSPORTATION
ELECTRIFICATION PROPOSAL**

San Francisco, California
December 11, 2017

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1 **MEMORANDUM**

2 This direct testimony was prepared by the Office of Ratepayer Advocates (“ORA”) in the
3 consolidated proceeding of Application (“A.”) 17-06-031 (PacifiCorp), A.17-06-033 (Liberty
4 Utilities), and A.17-06-034 (Bear Valley Electric Service Division). As part of this docket,
5 PacifiCorp requests Commission approval to implement its proposed Education and Outreach
6 Program and Demonstration and Development Program pursuant to Senate Bill (“SB”) 350.¹ In
7 this testimony, ORA presents its analysis and recommendations associated with the PacifiCorp’s
8 requests.

9 Matthew Yunge served as ORA’s project coordinator and Liam Weaver served as ORA’s
10 witness and is sponsoring this testimony. ORA’s legal counsel for this proceeding is
11 Tovah Trimming.
12

¹ Senate Bill SB 350 (de León, 2015), Chapter 547, Statutes of 2015.

1 **I. BACKGROUND**

2 In accordance with Rule 13.8 of the California Public Utilities Commission (“CPUC” or
3 “Commission”), Rules of Practice and Procedure, and the October 25, 2017 Scoping Memo and
4 Ruling of Assigned Commissioner and Administrative Law Judges (“Scoping Memo”), ORA
5 submits this testimony on the priority review project (“PRPs”) proposals relating to
6 transportation electrification (“TE”) projects filed by PacifiCorp in A.17-06-031.

7 PacifiCorp proposes two PRPs: the Education and Outreach Program and the
8 Demonstration and Development Program. The Education and Outreach Program has a
9 proposed budget of \$170,000 to develop advertising and online tools to educate customers,
10 provide customer communication through bill inserts and emails, offer technical assistance to
11 non-residential customers considering Electric Vehicle Supply Equipment (“EVSE”) projects,
12 and hold community events for public engagement with TE opportunities.² The Demonstration
13 and Development Program has a proposed budget of \$270,000 for awarding competitive grants
14 to third-parties to encourage development of TE projects among non-residential customers in
15 PacifiCorp’s service territory.³ Both projects would be funded by PacifiCorp’s existing
16 California Solar Initiative (“CSI”) program funds and, therefore, would not be incorporated into
17 rates.⁴ PacifiCorp also seeks authorization to file a Tier 2 advice letter to propose an extension
18 of the above programs, if approved, or for approval of future PRPs.⁵

19 **II. SUMMARY OF RECOMMENDATIONS**

- 20 1) The Commission should approve PacifiCorp’s request to use CSI funds for its PRP
21 projects.
- 22 2) The Commission should reject PacifiCorp’s request to file a Tier 2 Advice
23 Letter for future PRPs; instead, PacifiCorp should be required to file a new
24 application until the Commission establishes criteria for approval of PRPs via
25 the advice letter process.
- 26

² A.17-06-031, pp. 3-4.

³ A.17-06-031, pp. 4-6.

⁴ A.17-06-031, p. 7.

⁵ A.17-06-031, p. 7.

1 **III. DISCUSSION**

2 **A. The Commission should approve PacifiCorp’s request to use**
3 **CSI funds for its PRP projects.**

4 PacifiCorp proposes to fund both of its PRPs with a portion of the funds from its CSI
5 program. In Commission Decision (“D.”) 11-03-007, which authorized PacifiCorp’s CSI
6 program, the Commission determined that if there was a positive balance in the CSI funds at the
7 end of four years, “the Commission may order the disposition of any remaining balance,
8 including that it be returned to [PacifiCorp’s] customers.”⁶ This language is broad enough to
9 authorize the Commission to direct use of the CSI funds as requested by PacifiCorp.⁷ ORA
10 supports PacifiCorp’s request to use CSI funds for its pilot program because it would minimize
11 the impact of the TE program on PacifiCorp’s ratepayers by avoiding the issuance of a refund of
12 the unused CSI funds followed by a rate increase for any TE project approved in this proceeding.
13 However, if there are any remaining unused funds, they should be returned to PacifiCorp’s
14 ratepayers in accordance with D.11-03-007. The Commission, therefore, should approve
15 PacifiCorp’s request for authorization of CSI funding for the proposed PRPs.

16 **B. The Commission should reject PacifiCorp’s request to file a**
17 **Tier 2 Advice Letter for future PRPs because the request is**
18 **premature.**

19 PacifiCorp seeks authorization to use a Tier 2 Advice Letter (“AL”) to request an
20 extension of the two PRPs proposed in this Application, if approved, or for future PRPs, so long
21 as the request meets the requirements of the ACR.⁸ ORA supports PacifiCorp’s request to *extend*
22 the two PRPs proposed in this Application, if approved by the Commission, through a Tier 2 AL
23 filing for administrative efficiency. This is consistent with the ACR’s guidance, which permits
24 the smaller electric corporations to submit “a second phase of applications upon consideration of
25 the results from their first phase of applications and in furtherance of meeting the requirements
26 of Pub. Util. Code 740.12.”⁹ Thus, if PacifiCorp can demonstrate that the PRPs proposed in this
27 proceeding are successful and meet the requirements of SB 350 and the ACR’s regulatory
28 requirements, PacifiCorp can propose to extend the projects via a Tier 2 AL.

⁶ D.11-03-007, Ordering Paragraph 3.

⁷ D.11-03-007, p. 21.

⁸ A.17-06-031, p. 7.

⁹ R.13-11-007, Assigned Commissioner’s Ruling (Sept. 14, 2016), p. 13.

1 However, for new PRPs not approved in this proceeding, the Commission should require
2 PacifiCorp to submit an application. This approach is consistent with the ACR, which stipulates
3 that “if *future* Commission orders establish specific criteria for PRPs and investments,
4 subsequent TE projects and investments could conceivably be authorized through an Advice
5 Letter filing until the total priority review funding (up to \$20 million per utility) limit is
6 reached.”¹⁰ PacifiCorp’s request is premature, particularly considering the assertion PacifiCorp
7 presented in its application about the uncertainty around program design due to a current lack of
8 wide-scale adoption of EVs in its territory.¹¹ Therefore, the Commission should reject
9 PacifiCorp’s request to seek approval for future PRPs through a Tier 2 AL filings.

10 **IV. CONCLUSION**

11 For the foregoing reasons, ORA recommends that the Commission authorize PacifiCorp’s
12 proposal to use CSI funds for its PRPs because it would have neutral ratepayer impact, however,
13 any remaining unused funds should be returned to PacifiCorp ratepayers. In addition, ORA
14 recommends that the Commission authorize PacifiCorp to use a Tier 2 AL to request an
15 extension of its PRPs proposed in this Application, if approved by the Commission. Lastly, the
16 Commission should reject PacifiCorp’s request to seek future PRP approval through a Tier 2 AL
17 filing and, instead, require PacifiCorp to submit an application.

¹⁰ R.13-11-007, Assigned Commissioner’s Ruling (Sept. 14, 2016), p. 32 (emphasis added).

¹¹ PacifiCorp Testimony in A.17-06-031, Exh. PAC/100, p. 4.

APPENDIX A

QUALIFICATIONS OF WITNESS

1 **QUALIFICATIONS AND PREPARED TESTIMONY**

2 **OF**

3 **LIAM M. WEAVER**

4 Q1. Please state your name, business address, and position with the California Public Utilities
5 Commission.

6 A1. My name is Liam Weaver and my business address is 505 Van Ness Avenue,
7 San Francisco, CA 94102. I am a Utilities Engineer in the Energy Safety and
8 Infrastructure Branch of the Office of Ratepayer Advocates.

9
10 Q2. Please summarize your educational background.

11 A2. I graduated with a Master of Science in Engineering from the University of California,
12 Berkeley with a concentration in Energy, Civil Infrastructure, and Climate. I received a
13 Certificate in Engineering and Business for Sustainability and focused primarily on
14 optimization and integration of distributed energy resources, electric vehicles and
15 renewable resources. I also have an Honors Bachelor of Science degree in Civil &
16 Environmental Engineering from the University of Tennessee, Knoxville, with a minor in
17 Business Administration.

18
19 Q3. Briefly describe your professional experience.

20 A3. I joined ORA as a Utilities Engineer in 2017 and manage technical projects for Electric
21 Rule 21 Interconnection and Transportation Electrification. Before joining the ORA, I
22 spent 2 years working on climate change infrastructure resiliency research in conjunction
23 with the Knoxville Utilities Board, Oak Ridge National Laboratory, and the US
24 Department of Homeland Security, worked for 7 months as an energy optimization data
25 scientist for Greensparc, Inc., and completed an internship advising the technical team for
26 sustainable development at the New Zealand Green Building Council. My project work
27 at UC Berkeley also collaborated with industry partners and focused on: optimization,
28 aggregation, and integration of electric vehicle fleets to inform sustainable transportation
29 electrification policy; optimal management and dispatch of distributed energy resource
30 systems including Solar PhotoVoltaic and energy storage; electric vehicle and residential
31 demand response automation through cyber-physical systems; and machine learning
32 applications for Smart Grid Smart City program analysis.

33
34 Q4. What is your responsibility in this proceeding?

35 A4. I am sponsoring this testimony on PacifiCorp's TE pilot programs.

36
37 Q5. Does this conclude your prepared testimony?

38 A5. Yes, it does.