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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	<b>CASE NO. AVU-E-21-13</b>
<b>APPLICATION OF AVISTA</b>	)	
<b>CORPORATION FOR AN ORDER</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>AUTHORIZING PILOT PROGRAMS</b>	)	
<b>FOR THE RESEARCH AND</b>	)	<b>COMMENTS</b>
<b>DEVELOPMENT OF ELECTRIC</b>	)	
<b>TRANSPORTATION</b>	)	

The Idaho Conservation League (ICL) submits the following comments regarding Avista's proposed Electric Vehicle (EV) pilot programs. ICL appreciates Avista's efforts to bring additional EV chargers and novel EV research to Avista's service territory in Idaho. However, we disagree with Avista's proposal to pay for the program under Avista's Schedule 91 tariff because these funds are better spent on energy efficiency research and programs. We propose that Avista ensure the long-term viability of its Idaho EV program by developing a dedicated EV tariff that pays for this and future EV projects and that is funded, at least in part, by revenues from Avista's EV charging stations. Finally, we recommend some ways that Avista could offer a more robust EV program through additions to both the research and infrastructure portions of the pilot.

**I. Avista’s Proposed Pilot is Not an Appropriate Use of Schedule 91 Tariff Funds and Should Instead be Funded by a New EV Tariff.**

Although the two goals of Avista’s proposed pilot of researching renewable and storage options related to EV charging and building out Idaho’s charging infrastructure are critical for advancing broader climate objectives, neither of these goals directly improves energy efficiency. Energy efficiency is typically defined as mechanisms that reduce the overall energy usage of a technology without reducing the technology’s function.<sup>1</sup> The programs described in this pilot will not qualify as energy efficiency under this definition because more energy will be consumed by the charging technology once it is installed, even if the technology is powered by renewable or stored energy. In addition, it is not common practice for utilities and other energy industry players to refer to EV infrastructure or renewable- and storage- powered technology as energy efficiency measures. Avista, in its annual energy conservation reports, does not discuss EVs or renewable power, but instead describes more typical efficiency measures such as weatherization, fuel conversions, and efficient lighting and appliances.<sup>2</sup>

Because Avista’s Schedule 91 tariff is for energy efficiency research and implementation and the programs in the proposed pilot do not relate to energy efficiency, Avista should not use funds from this rider to pay for these programs. In its application, Avista states that the charger installation portion of the program fits under the “market transformation” part of Schedule 90, but market transformation programs are only eligible for funding if they “improve the adoption of electric efficiency measures that are not fully accepted in the marketplace.”<sup>3</sup> While Avista’s

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<sup>1</sup> See, e.g. U.S. Energy Information Administration, *Use of Energy Explained*, <https://www.eia.gov/energyexplained/use-of-energy/efficiency-and-conservation.php> (last visited Jan. 12, 2022).

<sup>2</sup> See Avista, *2019 Idaho Annual Conservation Report 55* (2020).

<sup>3</sup> Application at 9; Schedule 90, section 3.

proposed EV pilot will likely lead to more customers adopting EVs, it is unclear how these programs will lead to customers adopting energy efficiency measures in the future. Avista fits the research portion of the pilot under the R&D part of Schedule 90, but research into integrated charging infrastructure is not related to energy efficiency measures and money from this tariff is better spent on other efficiency research initiatives as described below. Furthermore, Avista was directed by the PUC to propose an “updated R&D program that includes metrics and measurable targets”<sup>4</sup> before spending additional R&D funds. Avista has not yet proposed and received approval for a full R&D program and the proposed R&D initiative in this proceeding does not include any measurable targets. Overall, Avista’s pilot programs do not fit into the requirements placed on the energy efficiency rider and should be funded through another source.

The funds from Avista’s energy efficiency rider are better spent on research and programs that expand innovative energy efficiency measures for Avista customers. For example, North Idaho contains numerous manufactured homes communities that suffer from high energy bills. Avista should implement greater energy efficiency measures for these homes. ICL recently learned from the Lewiston Community Action Partnership Agency about a method to install insulated roofing on manufactured homes to address health and safety issues and to enable additional weatherization measures. Avista could support this and similar efforts by researching and designing an optimized system to address the housing stock specific to its Idaho service territory. In addition, Avista could research and implement a program that provides energy efficiency upgrades to entire neighborhoods at one time.<sup>5</sup> This type of program helps to reduce bureaucratic costs associated with individual applications for efficiency upgrades. Given that

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<sup>4</sup> Order No. 35129, Case Nos. AVU-E-20-13 and AVU-G-20-08, p. 8 (Aug. 13, 2021).

<sup>5</sup> See, e.g. Duke Energy, *Neighborhood Energy Saver Program*, [https://www.epa.gov/sites/default/files/2017-06/documents/duke\\_energy\\_profile\\_508.pdf](https://www.epa.gov/sites/default/files/2017-06/documents/duke_energy_profile_508.pdf) (last visited Jan. 12, 2022).

homes in a given area of Idaho are often of a similar age and require similar upgrades, this neighborhood approach takes advantage of economies of scale because contractors can perform multiple identical upgrades in a short timeframe. Research and development focused on adapting ideas from other places and optimizing them for Avista's Idaho service territory is an excellent use of funds collected from Idahoans. This is especially true because Avista is uniquely situated by virtue of its technical staff, access to data, and operation of the system to translate general ideas into specific, local actions.

Given that Schedule 91 is not the appropriate source for EV infrastructure funding, ICL suggests that Avista develop a new EV schedule similar to Avista's Washington Schedule 77.<sup>6</sup> This schedule would provide a guarantee that some amount of money is devoted to supporting EV charger infrastructure, something that will become increasingly important as EVs gain popularity among Avista's customers. Avista can also help ensure the long-term viability of its EV programs by cycling revenues from the charging stations back into the EV tariff. ICL worries that without a dedicated EV tariff, Avista will continue to label EV chargers as "market transformation" and will continue to spend energy efficiency money on EV chargers instead of actual efficiency measures.

ICL acknowledges that it may be prudent to fund one year of Avista's current proposal from the energy efficiency rider so as not to delay the implementation of charging infrastructure in North Idaho. Given that the annual cost of Avista's proposal is low, ICL is not entirely opposed to this one-year use of the energy efficiency rider. Avista, however, should immediately begin the process of developing a new schedule for EV programs, so that future, more expensive, EV programs have available funding and Avista is not continuing to pull energy efficiency

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<sup>6</sup> See Avista, *Washington Schedule 77 Electric Transportation* (2021).

money away from actual efficiency projects. Indeed, a dedicated source of EV funding will ensure that the research and projects from the current pilot are “scalable” as Avista states in its application.<sup>7</sup>

**II. Avista’s Pilot Program Could Be Improved by Additions to Both the Research and Infrastructure Portions of the Pilot.**

Avista’s pilot program is an important step toward improving EV charging in North Idaho, but Avista can go further to implement meaningful EV programs. ICL recognizes that Avista has indicated that the proposed pilot is only an initial step toward installing EV infrastructure in Idaho and that the utility plans to grow the program in future years. That said, ICL suggests that Avista research how various EV charging behaviors, such as the time of day that individuals charge or the length of time that they charge, will affect cost of service across Avista’s Idaho service territory, particularly in the context of North Idaho’s rural environment. In addition to installing EV chargers, we suggest that Avista implement a low-income component to the EV program, similar to the low-income project in the Washington EV pilot.<sup>8</sup> For example, Avista could provide electric vehicles and chargers to non-profit institutions that provide mobile services to clients. Avista should also consider an EV program that creates incentives for rural small business owners and natural resource professionals who drive extensive miles for their jobs to purchase electric vehicles and install chargers at strategic places. Because these individuals put thousands of miles on their cars each year, an electric vehicle can have a major impact both for individuals’ business costs and for the climate.

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<sup>7</sup> Application, Case No. AVU-E-21-13, p. 7 (Sep. 9, 2021).

<sup>8</sup> Avista, EVSE Pilot Final Report, 22 (2019) (Exhibit No. 1 in Case No. AVU-E-21-13).

Finally, ICL notes that although Avista spent around \$3.85 million for its Washington EV pilot, Avista's proposed spending for the Idaho EV pilot is only \$410,000. Given that Idaho represents about one third of Avista's overall service territory, we would expect that Avista's spending on Idaho programs would roughly equal one third that of its spending in Washington. Under that logic, Avista should spend closer to \$1.3 million on the Idaho pilot. If Avista continues the Idaho EV program into future years, however, this spending discrepancy may be rectified.

### **Conclusion**

Overall, Avista has proposed a strong initial step in implementing EV infrastructure in North Idaho and ICL looks forward to the positive impact that these projects will have on Avista customers and the environment. ICL urges Avista, however, not to pay for EV pilots from the energy efficiency rider. Instead, Avista should develop an EV tariff that is funded by charging revenues and that provides a long-term dedicated source of money for EV projects. Avista should also expand both the research and program portions of its EV program by researching the effects of EV charging on overall cost of service and adding a low-income and small business EV vehicle and charger pilot to its offerings.

Respectfully submitted this 12th day of January, 2022

/s/ Emma Sperry  
Idaho Conservation League

With assistance from:  
/s/ Benjamin J. Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 12<sup>th</sup> day of January, 2022, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted.

/s/ Benjamin J. Otto  
**Benjamin J. Otto**  
Idaho Conservation League

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