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January 30, 2024

Monica Barrios-Sanchez, Commission Secretary  
Idaho Public Utilities Commission  
P O Box 83720  
Boise ID 83720-0074

RE: EV Infrastructure

Dear Ms Barrios-Sanchez:

As a landowner along the Interstate 90 corridor in Post Falls (an area currently underserved with EV infrastructure), we have explored the possibility of adding an EV charging station. Regrettably, the current demand charge model which we are subject to, renders that investment uneconomical. Avista's proposal for modified electricity rates could make that investment worthwhile for us and others. This change is a crucial step toward expanding the EV infrastructure in Idaho. Currently, the difference between demand charges and monthly revenues poses a significant obstacle, dissuading private investors like us from participating. This places the responsibility of developing EV infrastructure on local governments.

Avista's proposed rate design introduces an optional rate schedule for DCFC charging operations and eliminates the variable demand charges which addresses one of the significant operational challenges for current and prospective charging station owners and provides an avenue for private investment to yield viable and sustainable returns.

We encourage the Idaho Public Utilities Commission to consider and approve this proposal, recognizing it's potential to alleviate the financial burden on local governments while still supporting EV infrastructure growth.

Sincerely,

A handwritten signature in blue ink, appearing to read "Taggart Jacklin", is written over a horizontal line.

Taggart Jacklin, Manager

cc: David Meyer, Avista Vice President and Chief Counsel  
Patrick Ehrbar, Avista Director of Regulatory Affairs

ipuc avista ev infrastructure support

The following comment was submitted via PUCWeb:

Name: Brett Taylor

Submission Time: Feb 7 2024 6:08PM

Email: [brett@tschevy.com](mailto:brett@tschevy.com)

Telephone: 208-263-2138

Address: PO Box 580

Sandpoint, ID 83864

Name of Utility Company: Avista

Case ID: AVU-E-23-16

Comment: "To Whom It May Concern,

My name is Brett Taylor and I am the President and Dealer Principal of Taylor & Sons Chevrolet in Ponderay, Idaho. I am also the Owner / Operator of one of three DC Fast Charging stations in Bonner and Boundary counties. This is also the only DC Fast Charging station in the two most Northern counties currently serviced by Avista Utilities. Our station was commissioned July of 2023 and has been in operation for 7 months. When installing this station, Taylor & Sons motivation was influenced by a variety of factors. Those included manufacturer requirements, infrastructure for a percentage of vehicles that will be sold and repaired by our business, and contributing to our rural community by private investment for Electric Vehicle charging options. Taylor & Sons investment in this DC Fast Charging station was over \$150,000 between electrical contracting, earthwork, and the station itself. Given these initial fixed costs, I went into this project knowing that it would never be a profit center for my business, let alone achieve break even. However, our hopes were that revenue generated from the distribution of power would offset the incremental utility bill associated with the operation of the charger. As the only option available to us was Avista's schedule 11, the operation of this station is subject to a substantial demand charge. This means the first time a vehicle that is equipped to maximize the output of our 184kW charger plugs in, Taylor & Sons incurs a \$1,066 demand charge potentially on the first event of any billing cycle. This demand charge is in addition to any actual electrical consumption that takes place during a given billing cycle. On average, actual billing for electrical consumption as a percentage of billing for demand charge is 9.7%. This excessive demand charge makes it nearly impossible to generate enough revenue during a given billing cycle to offset the utility bill. In fact, during the seven months of operation of our DC Fast Charging station we have averaged a \$307.54 per month revenue shortfall as compared to monthly billing. Effectively, we are providing customers with free fuel.

Feedback I have been provided by station users has been one of gratitude. This station, like most DC Fast Chargers in rural areas, is primarily used by individuals passing through. This could include Canadian's on their way to vacation in Idaho, visitors to Schweitzer Mountain Resort, or those needing to conduct commerce in North Idaho. I have had several interactions with customers that stated this station was the reason they were able to operate their Electric Vehicle for whatever business was being conducted in the greater Sandpoint area.

Taylor & Sons and myself would like to voice our support for Avista's proposed schedule 23. Although the proposed schedule is not ideal, it is a substantial improvement as compared to the current schedule 11 we are currently billed under.

Respectfully,

Brett Taylor  
President  
Taylor & Sons Chevrolet  
476751 Highway 95 N  
Ponderay, ID 83852

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