

NEBRASKA PUBLIC POWER DISTRICT

MANAGEMENT REPORT
ON
ELECTRIC VEHICLE (EV) CHARGING PROGRAMS

OF THE
PUBLIC UTILITY REGULATORY POLICIES ACT
(PURPA)

JUNE 8, 2023

A. PURPA Electric Vehicle (EV) Charging Programs Standard

The U.S. Congress passed the Infrastructure Investment and Jobs Act of 2021 (IIJA), which amended the Public Utility Regulatory Policies Act of 1978 (PURPA) by adding two new federal standards for qualifying utilities to consider and determine whether to adopt by November 15, 2023. One of these standards requires utilities to consider “**Electric Vehicle (EV) Charging Programs**”.

PURPA Section 111(d)(21) retail service standard states:

Each State shall consider measures to promote greater electrification of the transportation sector, including the establishment of rates that:

- a) Promote affordable and equitable electric vehicle charging options for residential, commercial, and public electric vehicle charging infrastructure.
- b) Improve the customer experience associated with electric vehicle charging, including by reducing charging times for light-, medium-, and heavy-duty vehicles.
- c) Accelerate third-party investment in electric vehicle charging for light-, medium-, and heavy-duty vehicles.
- d) Appropriately recover the marginal costs of delivering electricity to electric vehicles and electric vehicle charging infrastructure.

B. NPPD Consideration of PURPA Standard

Nebraska Public Power District (NPPD) is a political subdivision of the State of Nebraska whose rate setting requirements are governed by Section 70-655 of the Nebraska Revised Statutes. Section 70-655 states that the publicly elected Board of Directors shall have the power and be required to fix, establish, and collect adequate rates for electrical energy which rates are fair, reasonable, and nondiscriminatory.

In accordance with this regulatory requirement, NPPD’s ratemaking objectives include the following principles:

- Recovery of revenue requirements
- Fair distribution of costs
- Provision of accurate price signals
- Revenue stability
- Rate stability
- Simplicity, practicality, public acceptability

NPPD has initiated the following activities to promote the greater electrification of the transportation sector:

- a) Residential – Provided incentives for Level 2 chargers and for installation of wiring for EV chargers in existing and new dwellings
- b) Commercial – Provided incentives for Level 2 and Level 3 (DC fast chargers) EV chargers and incentives for conduit for EV chargers
- c) Installed and/or plans to install five Level 3 chargers across greater Nebraska by the end of 2023, helping to provide EV charging throughout the state
- d) Provided incentives for five additional Level 3 commercial and non-profit chargers across our service territory
- e) Developed a Residential Time-of-Use rate that includes a Super Off-Peak period that incentivizes EV charging during low-cost hours
- f) Developed Commercial rates based only on energy and do not include demand charges which encourages the use and installation of Level 3 chargers
 - i. NPPD’s General Service and General Service Demand rates would generally be applicable for EV chargers. Neither rate has a demand charge.

C. Recommendation

NPPD has a history of promoting and being a leader in measures to promote greater electrification of the transportation sector, including the establishment of rates. As a result, NPPD’s current practices and overall philosophy comply with the spirit of this standard; however, Management recommends that the Board decline to adopt the PURPA standard described herein and instead consider and adopt the following as NPPD’s Electric Vehicle (EV) Charging Program standard.

NPPD will continue to evaluate opportunities to develop new and expand current EV charging programs while also promoting rate designs that encourage electrification of the transportation sector.