

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN RE THE MATTER OF SOUTH DAKOTA PUBLIC UTILITIES COMMISSION, ELECTRIFICATION OF TRANSPORTATION INVESTIGATION	DOCKET NO. AA22-002
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COMMENTS

MidAmerican Energy Company appreciates the opportunity to provide information to the Commission regarding electrification of transportation vehicles. As requested, these comments cover four topic areas.

Existing measures used to promote electrification of transportation

Response: MidAmerican has undertaken several efforts to help promote electrification of transportation throughout its service territory. In Iowa, MidAmerican has installed publicly available direct current fast chargers for electric vehicles at 35 different locations throughout the state to help reduce range anxiety. MidAmerican offers rebates to Iowa residential customers for the purchase or lease of new electric vehicles and to Iowa non-residential customers for the purchase of electric vehicle supply equipment to help encourage and support the adoption of electric vehicles. MidAmerican also promotes electrification of transportation through customer education at conferences, trade events, electric vehicle car shows and other similar outreach opportunities.

MidAmerican is a founding member of the National Electric Highway Coalition (NEHC) which is a collaboration among electric companies that are committed to providing electric vehicle electric vehicle fast charging stations that will allow the public to drive electric vehicles with confidence along major U.S. travel corridors by the end of 2023. The NEHC is the largest such alliance of electric companies that have organized around the common goal of deploying electric vehicle fast charging infrastructure to support the growing number of electric vehicles and to help ensure that the transition to electric vehicles is seamless for drivers.

Existing rate mechanisms

b. Existing rate mechanisms that:

1. promote affordable and equitable electric charging options, if any;

Response: MidAmerican does not currently offer rates targeted specifically to electric vehicle charging. However, most MidAmerican rates reflect a declining block structure, which can result in lower rates for incremental load such as electric vehicle charging. For example, residential customers receive lower rates for all usage over 1,000 kWh. In addition, MidAmerican offers its South Dakota customers optional time-of-use rates which provide access to significantly reduced rates for use during off-peak hours. Customers that can charge electric vehicles during these off-peak hours may find that their load profile now enables them to take advantage of the savings available on time-of-use rates.

2. improve customer experience associated with charging, if any;

Response: MidAmerican does not currently offer any rates or programs targeted specifically to electric vehicle charging in South Dakota.

3. accelerate third-party investment, if any;

Response: MidAmerican does not currently offer any rates or programs targeted specifically to electric vehicle charging in South Dakota. However, to the extent that customers can take advantage of rate design options described above that enable low-cost electric vehicle charging, third-party investment is indirectly incentivized.

4. and appropriately recover the marginal costs of delivering electricity to electric vehicles and electric vehicle infrastructure, if any.

Response: MidAmerican does not currently offer any rates or programs targeted specifically to electric vehicle charging in South Dakota. All existing rates are based on cost-of-service studies as filed in formal rate case filings with the Public Utilities Commission.

Previous actions taken by the Public Utilities Commission or State Legislature

Response:

MidAmerican defers to the Public Utilities Commission as having the most accurate knowledge of its own actions taken around electrification of transportation. It would appear there are currently no South Dakota laws regulating electric vehicles. South Dakota passed a \$50 per electric vehicle tax in 2021 to fund highway maintenance and improvements and address the diminution in gas tax revenues from citizens who use electric vehicles.

South Dakota prepared an electric vehicle fast charging plan, and that plan has been approved by the White House.

[South Dakota EV Fast Charging Plan - South Dakota Department of Transportation \(sd.gov\)](#)

Appropriate measures to promote greater electrification of the transportation sector

Response:

MidAmerican believes that any measures to promote greater electrification of the transportation sector should be carefully designed to avoid deterioration of a customer's load profile or subsidization by non-participating customers. Properly designed time-of-use rate incentives should help ensure that incremental load from electric vehicle charging is not subsidized.

Commercial vehicle charging facilities should be subject to careful planning to minimize any distribution facility upgrades to accommodate the incremental load. Consideration should be given to requiring time-of-use rate and/or demand rates for any customers who receive rebates or other incentives for electric vehicle purchase or charging.

Demand rate "holidays" are often proposed to mitigate the impact of demand rates on larger public charging facilities as use of these facilities ramp up over time. Implementation of any such measures should be conditioned on availability of distribution infrastructure to support the increased load, and consideration should be given to requiring that such load be interruptible while the rate "holiday" is in effect.

Given the impact of cold weather on the efficiency of electric vehicles, solutions that address cold weather differential performance will be important for South Dakota and other northern states.

Respectfully submitted,

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