

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

DOCKET NO. 19-035-T16

Rocky Mountain Power's Proposed Tariff Revisions to Schedule 120, Plug-in Electric Vehicle Incentive Pilot Program.

**COMBINED MOTION TO INTERVENE
AND MOTION FOR EXTENSION OF PROCEDURAL SCHEDULE
OF CHARGEPOINT, INC.**

ChargePoint, Inc. (ChargePoint), respectfully moves to intervene in the above-captioned docket. ChargePoint further moves the Public Service Commission (Commission) to extend the procedural schedule in this docket. As grounds for this motion, ChargePoint states as follows:

1. ChargePoint is the nation's leading electric vehicle (EV) charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 100,700 independently owned charging spots, ChargePoint drivers have completed more than 62 million charging sessions, saving upwards of 70 million gallons of gasoline and driving more than 1.6 billion gas-free miles.

2. ChargePoint designs, manufactures, and deploys residential and commercial AC Level 2 (L2) and DCFC electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem. ChargePoint sells EV charging equipment and network services to a wide variety of customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, and multi-unit dwelling owners. ChargePoint offers a broad array of products and services that can serve light, medium, or heavy-duty electric vehicles.

3. In Rocky Mountain Power's (RMP's) Advice No. 19-16, RMP proposes revisions to Electric Service Schedule No. 120, Plug-in Electric Vehicle Incentive Pilot Program. ChargePoint's customers participate in this program. Accordingly, ChargePoint has a substantial interest that will be affected by the outcome of this docket. ChargePoint therefore requests status as a party in this docket with all rights appurtenant thereto.

4. ChargePoint requests that all pleadings, correspondence, discovery, and other documents be served on Mr. Justin Wilson at the following address (electronic service preferred):

Justin Wilson
Director, Public Policy
ChargePoint, Inc.
254 E Hacienda Ave.
Campbell, CA 95008
(479) 283-2995
justin.wilson@chargepoint.com

5. ChargePoint further moves the Commission to grant a modest extension to the procedural schedule in this docket. Specifically, ChargePoint requests that the Commission extend all deadlines, including the initial comment deadline, the reply comment deadline, and the effective date, by two weeks. If the Commission grants ChargePoint's request, initial comments would be due on December 17, 2019, reply comments would be due on December 24, 2019, and the effective date of any changes to the tariff would be January 1, 2020. The Commission would benefit from this modest extension as it would provide interested parties with the necessary time to fully address the complexity of the issues involved in this proceeding.

WHEREFORE, ChargePoint respectfully requests that the Commission grant its Combined Motion to Intervene and Motion to Extend Procedural Schedule in the above-captioned proceeding so that ChargePoint may participate with full rights as a party. ChargePoint's intervention will advance a just resolution of the proceeding and should be granted.

Respectfully submitted on November 25, 2019.

/s/ Justin Wilson

Justin Wilson

Director, Public Policy

ChargePoint, Inc.

254 E Hacienda Ave.

Campbell, CA 95008

(479) 283-2995

justin.wilson@chargepoint.com

CERTIFICATE OF SERVICE

I hereby certify that I have on November 25, 2019, I have duly served a true and correct copy of the foregoing **COMBINED MOTION TO INTERVENE AND MOTION FOR EXTENSION OF PROCEDURAL SCHEDULE OF CHARGEPOINT, INC.** upon all parties email.

/s/ Scott F. Dunbar
Scott F. Dunbar