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Counsel for ChargePoint, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

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| In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations | Docket No. 20-035-04 |
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**MOTION TO INTERVENE
OF CHARGEPOINT, INC.**

Pursuant to Public Service Commission Administrative Procedures Act Rule R746-1-108 and Utah Code Section 63G-4-207, ChargePoint, Inc. (ChargePoint), respectfully moves to intervene in the above-captioned docket. As grounds for this motion, ChargePoint states as follows:

1. ChargePoint is the leading electric vehicle (EV) charging network in the world, with scalable solutions for every charging need and for all of the places that EV drivers go: home, work, around town, and on the road. ChargePoint’s network offers more than 114,000 places to charge, including more than 1,300 spots in Utah, and those numbers continue to grow. With thousands of customers in several verticals including workplaces, cities, retailers, apartments, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app,

plugging into a charger, managing the station or analyzing charging data. On the network, drivers have completed more than 80 million charging sessions, saved upwards of 96 million gallons of fuel, and driven more than 2.3 billion electric miles.

2. ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. Hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light and medium duty and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. All products are UL-listed, ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

3. ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has

designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

4. In Rocky Mountain Power's (RMP) Application for General Rate Increase (Application), RMP proposes to redesign Schedule 6A to charge General Service customers for demand in an alternative way.¹ RMP states that the redesign of Schedule 6 is intended to mitigate the impact of demand charges on low-load factor customers such as DC fast chargers for EVs.²

5. RMP's proposed redesign of Schedule 6A will directly affect customers' cost of hosting DC fast chargers, including DC fast chargers sold by ChargePoint and that run on ChargePoint's network. As a provider of EV charging equipment and network services, RMP's proposed redesign of Schedule 6A and any modifications made to RMP's proposal in the course of this proceeding will directly affect ChargePoint's ability to sell its products and services in RMP's service territory.

6. 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.

7. ChargePoint requests that all pleadings, correspondence, discovery, and other documents be served on Mr. Scott Dunbar and Mr. Matthew Deal at the following addresses (electronic service preferred):

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¹ Direct Testimony of Robert Meredith, p. 34, ll. 682-685.

² *Id.* at 39, l. 796.

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WHEREFORE, ChargePoint respectfully requests that the Commission grant its Motion to Intervene 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 August 11, 2020,

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Certificate of Service
Docket No. 20-035-04

I hereby certify that a true and correct copy of the foregoing document was served by email this 11th day of August, 2020, on the following:

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