#### **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH**

Docket No. 20-035-34

Rocky Mountain Power's Notice of Intent to File a Proposed Charging Infrastructure Program with the Public Service Commission of Utah

# **REQUEST FOR NOTICE OF CHARGEPOINT, INC.**

Pursuant to the Public Service Commission of Utah's (Commission) Notice issued in this docket on August 28, 2020 and UCA § 54-4-41, ChargePoint, Inc. (ChargePoint), respectfully files this request for notice in the above-captioned docket. As grounds for this request, 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 116,000 places to charge, including more than 1,400 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 82 million charging sessions, saved upwards of 98 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

1

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. Before submitting a proposed charging infrastructure program to Commission approval, UCA § 54-4-41 directs Rocky Mountain Power (RMP) to "seek and consider input from ... third-party electric vehicle battery charging service operators; and ... any other person

2

who files a request for notice with the commission" (among others). The Commission's August 28, 2020 Notice directed any parties that would like to provide input at RMP's scheduled stakeholder meeting to file a request for notice in this docket by September 18, 2020.

5. ChargePoint hereby requests the ability to provide feedback at RMP's scheduled stakeholder meeting on September 24, 2020, as well as any additional stakeholder meetings or comment periods that may be scheduled in the future. As a third-party provider of EV charging stations and charging services, ChargePoint qualifies as an entity from which RMP must seek and consider input. As a leading provider of EV charging infrastructure and network services that participates frequently in utility regulatory proceedings across North America, ChargePoint will bring its experience and expertise to bear in providing feedback to RMP in the development of its EV charging infrastructure program proposal.

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

Scott Dunbar Partner, Keyes & Fox LLP 1580 Lincoln St., Suite 880 Denver, CO 80203 949.525.6016 sdunbar@keyesfox.com

Justin Wilson Director, Public Policy ChargePoint, Inc. 254 E Hacienda Ave. Campbell, CA 95008 479.283.2995 justin.wilson@chargepoint.com ChargePoint looks forward to participating in RMP's planned stakeholder meetings and process to develop its EV charging infrastructure program proposal.

Respectfully submitted on September 18, 2020,

<u>/s/ Scott F. Dunbar</u> Scott Dunbar Partner, Keyes & Fox LLP 1580 Lincoln St., Suite 880 Denver, CO 80203 949.525.6016 sdunbar@keyesfox.com

# Certificate of Service

Docket No. 20-035-04

I hereby certify that a true and correct copy of the Request for Notice on behalf of ChargePoint, Inc. was served by email this 18<sup>th</sup> day of September 2020, on the following:

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Matthew Moscon Lauren Shurman

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> <u>/s/ Blake Elder</u> Blake Elder Keyes & Fox LLP