

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

Docket No. 20-035-34

Application of Rocky Mountain Power for Approval of its Electric Vehicle Infrastructure Program

**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 a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

2. ChargePoint's 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 duty, 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 EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular

design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

3. ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, 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 Approval of its Electric Vehicle Infrastructure Program (EVIP), RMP proposes to invest in Company-owned DCFCs at 20-25 locations, to provide incentives to customers for make-ready infrastructure to support the deployment of EV charging stations owned by customer site hosts, to continue to provide incentives through the existing STEP Program and Schedule 120, and to engage in innovation partnerships and projects related to EVs and EV charging. RMP also proposes to introduce or modify four rate schedules: Schedule 198, which would recover the cost of the EVIP; Schedule 60, which would establish charging prices at Company-owned DCFCs; Schedule 2E, which would provide time-of-use rates to residential customers on a pilot basis; and Schedule 120, which would continue the existing incentives under Schedule 120 for the proposed duration of the EVIP.

5. As a provider of EV charging station hardware and network services, RMP's EVIP proposals and tariff proposals will directly and substantially affect ChargePoint's pecuniary interests in the following ways:

- a. RMP's proposed incentives for make-ready infrastructure will directly impact the cost installing and hosting EV charging stations, including ChargePoint's products and services.
- b. ChargePoint's ability to qualify its products for RMP's proposed make-ready incentives will directly impact ChargePoint's ability to sell its products and services in RMP's service territory.
- c. RMP's proposal to own and operate DCFCs and sell charging services to drivers at a tariffed rate, including its proposed discount for EV drivers who are RMP customers, will impact ChargePoint's ability to sell DCFCs to prospective site hosts in RMP's service territory.
- d. RMP's proposed residential time-of-use pilot will directly impact ChargePoint's ability to sell its products and services to residential customers in RMP's service territory.

6. Accordingly, the Commission's approval, denial, or modification of RMP's proposals will directly impact ChargePoint's substantial and pecuniary interests in this proceeding. 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. Through its participation in this proceeding, ChargePoint may identify additional concerns or areas of support in RMP's Application.

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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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 31, 2021,

/s/ Scott F. Dunbar
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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2021, I have duly served a true and correct copy of the foregoing **MOTION TO INTERVENE OF CHARGEPOINT, INC.** upon all parties email.

/s/ Scott F. Dunbar
Scott F. Dunbar