

Linda M. Bullen, Nevada Bar No. 7629  
Bullen Law, LLC  
8635 W. Sahara Ave. #454  
Las Vegas, NV 89117  
702.279.4040

*Attorney for Zeco Systems, Inc. d/b/a Greenlots*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

|  |   |
|--|---|
| <b>APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF ITS ELECTRIC VEHICLE INFRASTRUCTURE PROGRAM</b> | <b>Docket No. 20-035-34</b><br><b>PETITION FOR LEAVE TO INTERVENE OF ZECO SYSTEMS, INC. D/B/A GREENLOTS</b> |
|--|---|

Pursuant to Public Service Commission Administrative Procedures Act Rule R746-1-108 and Utah Code Section 63G-4-207, Zeco Systems, Inc. d/b/a Greenlots (“Greenlots”), by and through counsel Bullen Law, LLC, respectfully petitions the Public Utilities Commission of Utah (the "Commission") for an order granting it intervener status in the above-captioned docket. In support of its petition, Greenlots states:

Greenlots is a corporation organized pursuant to the laws of the State of Delaware, and its address is:

Zeco Systems, Inc. d/b/a Greenlots  
767 S. Alameda Street, Suite 200  
Los Angeles, CA 90021

Greenlots is a leading provider of electric vehicle (“EV”) charging software and a member of the Shell Renewables & Energy Solutions group. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of the Level 2 infrastructure. Greenlots’ smart charging solutions are built around an open standards-based focus on future flexibility while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and improve system efficiency.

The Greenlots network is also supporting the deployment of Shell Recharge, which in the U.S. is beginning to be deployed to provide Shell's retail customers - including convenience stores, service stations, and drivers - on the go charging.

3. On August 23, 2021, PacifiCorp, dba Rocky Mountain Power ("RMP" or the "Company") submitted an application to the Commission, pursuant to section 54-4-41 of the Utah Code, requesting approval of the Company's Electric Vehicle Infrastructure Program ("EVIP"). The Company's EVIP Application includes a proposal to install, own and operate DCFC at 20-25 locations, at which the Company proposes to charge a differentiated rate for EV drivers that are Rocky Mountain Power customers and non-customers. The Application also proposes a make ready infrastructure program, extending existing EV infrastructure incentives (STEP program and Schedule 120), developing an innovation partnership related to EVs and EV charging, and modifying several rate schedules.

4. Greenlots has a direct, specific business interest in this proceeding, and its legal rights and interests will be substantially affected by this proceeding. As a provider of EV charging software, equipment, and services to a range of clients, including consumers, site hosts, fleets, utilities and municipalities, Greenlots has a significant interest in the growth of the market for electric vehicle charging infrastructure and the role of utilities in scaling the market for electric vehicle charging infrastructure. Greenlots also has a direct and substantial economic interest in the sustainable and scalable growth of Utah's EV and EV infrastructure markets and in the broader regulatory and business landscape that affects the prospects of current and future EV-related business endeavors in the state. As a provider of EV charging software, equipment, and services, including to electric utilities, Greenlots' interests will be affected by the Commission's final determination in this proceeding on the Company's EVIP filing.

Greenlots' interest is also sufficiently different from that of any other party and will add measurably and constructively to the scope of the case. Indeed, no other party can adequately represent the interests of Greenlots in this proceeding. While other companies within the broader EV charging industry have also filed motions to intervene in this docket, those companies and Greenlots have differentiated business models and product offerings, and different market perspectives that substantively and directly pertain to the issues at hand in this proceeding. Topics addressed or implicated by the Company's EVIP filing including ownership and operation of charging stations, procurement of charging hardware and software, rates offered to drivers and equitable access to electric transportation. These are all topics about which Greenlots' policy, regulatory and market perspectives are informed by Greenlots' commercial experience across many jurisdictions, and differ from those of other EV charging companies, and will add significant value to this proceeding.

Further, Greenlots will positively contribute to the record in this proceeding in a manner that will aid the Commission in rendering a final decision on the programmatic issues within the plan, which will impact the State's ability to effectively advance transportation electrification. Greenlots will assist in the Commission's review of this matter by fostering a robust and fully informed discussion related to the broader EV charging industry and market and to what extent the EVIP will equitably reduce market barriers and facilitate EV adoption within the Company's service territory, and elsewhere in the state. Greenlots' intervention in this matter will neither complicate nor disrupt the proceedings, as Greenlots desires to play a constructive role in this matter as it has demonstrated in many other proceedings across the country by isolating the issues of utmost importance and offering valuable input into possible resolutions. The interests of justice and the orderly and prompt conduct of the proceeding will not be materially impaired,

and will be advanced, by allowing the full participation of Greenlots.

5. Greenlots' participation and interest in this proceeding is based upon the issues included in the Company's application and Greenlots does not seek to raise issues outside of the application.

6. Greenlots has not yet determined specific positions it will take or the relief it will seek. Greenlots seeks to intervene to protect its substantial business interests over the course of the proceeding.

7. Greenlots requests that all notices, pleadings, documents, discovery, and correspondence pertaining to this proceeding should be directed to the following:

Linda M. Bullen  
Bullen Law, LLC  
8635 W. Sahara Ave. #454  
Las Vegas, NV 89117  
(702)279-4040  
linda@bullenlaw.com

Erick Karlen  
Greenlots  
767 S. Alameda Street, Suite200  
Los Angeles, CA 90021  
ekarlen@greenlots.com

Thomas Ashley  
Greenlots  
767 S. Alameda Street, Suite 200  
Los Angeles, CA 90021  
tom@greenlots.com

WHEREFORE, Greenlots respectfully petitions the Commission for an Order granting intervention in this proceeding and allowing Greenlots to proceed as a party of record with full participation, and that it be entitled to be served with copies of all pleadings, testimony, work papers, exhibits on file or to be filed by any party of interest, and that its undersigned attorney

///

///

///

be granted the opportunity to sign the NDA pursuant to the Commission's September 27<sup>th</sup>, 2021  
Order Granting Motion for Protective Order.

Dated October 13, 2021.

Respectfully submitted,

/s/ Linda M. Bullen

Linda M. Bullen  
Attorney for Zeco Systems, Inc. d/b/a Greenlots

## **CERTIFICATE OF SERVICE**

**Docket No. 20-035-34**

I hereby certify that a true and correct copy of the Zeco Systems, Inc. d/b/a Greenlots Petition for Leave to Intervene was served by email this 13th day of October, 2021 on the following:

### **ROCKY MOUNTAIN POWER**

Richard Garlish richard.garlish@pacificorp.com

Emily Wegener emily.wegener@pacificorp.com

Jana Saba jana.saba@pacificorp.com

datarequest@pacificorp.com

utahdockets@pacificorp.com

### **DIVISION OF PUBLIC UTILITIES**

Justin Jetter jjetter@agutah.gov

Chris Parker chrisparker@utah.gov

William Powell wpowell@utah.gov

Patricia Schmid pschmid@agutah.gov

dpudatarequest@utah.gov

### **OFFICE OF CONSUMER SERVICES**

Michele Beck mbeck@utah.gov

Robert Moore rmoore@agutah.gov

Steven Snarr stevensnarr@agutah.gov

Alex Ware aware@utah.gov

### **UTAH ASSOCIATION OF ENERGY USERS**

Phillip J. Russell prussell@jdrslaw.com

### **CHARGEPOINT**

Scott Dunbar sdunbar@keyesfox.com

Justin Wilson justin.wilson@chargepoint.com

### **UTAH CLEAN ENERGY**

Kate Bowman kate@utahcleanenergy.org

Hunter Holman hunter@utahcleanenergy.org

Sarah Wright sarah@utahcleanenergy.org

**WESTERN RESOURCES ADVOCATES**

Sophie Hayes sophie.hayes@westernresources.org

Aaron Kressig aaron.kressig@westernresources.org

Deborah Kapiloff deborah.kapiloff@westernresources.org

Callie Hood callie.hood@westernresources.org

**EVGO SERVICES, LLC**

Lindsey Stegall Lindsey.StellAevgo.com

Victoria R. Mandell vmandell@comcast.net

By: Linda M. Bullen

/s/ Linda M. Bullen

Bullen Law, LLC