

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

Docket No. 21-035-16

Collaborative Stakeholder Process for Rocky Mountain Power's Grid Modernization and Rate Design

**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 the Commission's Second Scheduling Order issued on June 14, 2021 in this proceeding, the Commission stated: "Any interested person that wishes to participate in the Informal WG [workgroup] Meetings may file a petition for intervention in this docket." ChargePoint respectfully states that it would like to participate in the Informal WG Meetings and therefore requests intervention in this proceeding. ChargePoint's legal rights and interests may be substantially affected by this proceeding. ChargePoint has not yet determined the positions it may take in this proceeding but seeks to intervene for the purpose of protecting these interests.

5. 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):

Scott Dunbar
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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 September 13, 2021,

/s/ Scott F. Dunbar
Scott Dunbar
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CERTIFICATE OF SERVICE

I hereby certify that on September 13, 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