

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

Docket No. 21-035-70

IN THE MATTER OF ROCKY MOUNTAIN POWER'S EVALUATION OF ELECTRIC
VEHICLE TIME OF USE PILOT PROGRAM

**MOTION TO INTERVENE AND ENTRY OF APPEARANCE OF COUNSEL
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 Docket No. 20-035-34, the Commission approved a Settlement Stipulation. As a party to that docket, ChargePoint did not oppose but did not join the Settlement Stipulation. Among other provisions, Paragraph 48 of the Settlement Stipulation provided that Rocky Mountain Power would initiate this docket to evaluate potential redesign and continuation of Schedule 2E. Paragraph 48 of the Settlement Stipulation also provided that residential customers that received Schedule 120 incentives for installing EV charging stations, including residential customers that install ChargePoint's charging stations, would be required to take service on Schedule 2E or its successor tariff.

5. As a provider of EV charging station hardware and network services, ChargePoint's business interests may be substantially affected by any changes to Schedule 2E. Specifically, the

value proposition of ChargePoint's residential charging hardware and services will be impacted by any revisions to Schedule 2E that are approved in this proceeding.

6. ChargePoint requests that all pleadings, correspondence, discovery, and other documents be served on Scott Dunbar, Matthew Deal, and Jared Ballew 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.

Pursuant to Public Service Commission Administrative Procedures Act Rule R746-1-107(1)(a)(ii), the undersigned attorney, Scott F. Dunbar of the law firm Keyes & Fox LLP, hereby enters his appearance on behalf of ChargePoint, Inc. (ChargePoint). Mr. Dunbar is an attorney in

good standing in the State of Colorado, with Colorado bar number 44521. A certificate of good standing for Mr. Dunbar issued by the Supreme Court of the State of Colorado is attached to this pleading. ChargePoint respectfully requests that all documents and correspondence regarding this matter be sent to Mr. Dunbar at the address and/or email address below (electronic service and communications preferred).

Respectfully submitted on March 23, 2022,

/s/ Scott F. Dunbar

Scott Dunbar

Partner, Keyes & Fox LLP

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2022, 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