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May 18, 2023

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Re: Docket No. 23-035-18 - Reply Comments of ChargePoint

On May 3, 2023, ChargePoint, Inc. (ChargePoint), the Utah Division of Public Utilities (the Division), Western Resource Advocates and Utah Clean Energy (collectively, WRA/UCE), and Office of Consumer Services (OCS) submitted comments regarding the first Annual Report of Rocky Mountain Power's (RMP or the Company) Electric Vehicle Infrastructure Program. ChargePoint appreciates the opportunity to submit reply comments to support a concern raised both by the Division and WRA/UCE regarding proposed locations of Company-owned chargers.

Comments submitted by the Division and WRA/UCE observe that RMP's proposed charger sites are predominantly located east of the I-15 corridor, overlapping with areas with high EV adoption. As a result, the Division expresses concern that RMP's sites could "leave the less populated areas with insufficient charging locations."¹ WRA/UCE notes, "...there is not enough information to know whether the locations are targeted to provide equitable access to charging for customers without at-home charging."²

The Division and WRA/UCE encourage RMP to explore efforts to focus the Company-owned program on areas that face greater barriers to EV adoption, such as rural communities, areas with a greater proportion of low-income residents, and areas with a greater number of residents in multi-unit dwellings (MUDs). The Division also commented that it is "not aware of any third-party operator plans to install charging locations and does not know how many charging ports will be made available throughout the rest of Utah, other than those provided by RMP in DPU DR 1.4 and other charging location map apps on the Internet."

ChargePoint appreciates the equity concerns raised by the other commenting parties and offers one additional related concern regarding how the sites selected by RMP will impact the number of charging ports available throughout the rest of Utah by third-party operators. Site hosts³ investing their own capital to offer EV charging services typically prioritize areas with high EV

¹ Division Initial Comments at 5.

² WRA/UCE Initial Comments at 2.

³ "Site host" refers to the owner or lessor of the property on which an EV charging station is located. Site hosts include owners of MUDs; commercial customers that offer charging to the public, their customers, and/or their employees; fleet owners; and government entities.



adoption because utilization is a key driver of the financial viability of a charging station. Adjacent DCFC sites significantly affect one another's economics, particularly as EV adoption is nascent. For this reason, site hosts investing their own capital may be less willing to install chargers in areas where RMP's public chargers are known to be in development, particularly as RMP has significant advantages as the monopoly utility in the provision of EV charging services that are unavailable to third-party operators.

Because RMP intends to proceed with Company-owned chargers in areas with high EV adoption, the Company-owned program is likely to get ahead of forthcoming private investment in the areas most ready to be served by the competitive market. This dynamic not only makes it more likely that the concerns of the Division and WRA/UCE (i.e., that Company-owned chargers do not sufficiently serve areas with low EV adoption) come to fruition, but it also means that the Company-owned chargers are likely to supplant private investment in areas the market is ready to serve.

Though RMP's program is in its initial phase, ChargePoint supports the recommendation of the Division and WRA/UCE that RMP should focus the deployment of Company-owned chargers in rural areas, low-income areas, and areas with a greater proportion of residents without access to home charging. Such focus is paramount, not only to improve program equity, but also to minimize the risk that RMP's Company-owned Program inhibits the development of a competitive market for EV charging services in Utah.

ChargePoint appreciates the opportunity to submit these reply comments and looks forward to continuing to support the proliferation of EV charging stations in Utah.

Sincerely,

/s/ Matthew Deal

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