

**BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION
OF THE STATE OF WASHINGTON**

PacifiCorp dba Pacific Power & Light Company)	Docket No. UE-220359
)	
Washington State Transportation Electrification Plan)	Petition to Intervene of ChargePoint, Inc.
)	

1. ChargePoint, Inc. (ChargePoint) respectfully submits this Petition to Intervene pursuant to WAC § 480-07-355 of the Washington Utilities and Transportation Commission’s (Commission) Procedural Rules and states as follows in support:

2. 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.

3. 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.

4. 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.

5. In this proceeding, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or the Company) has filed a Transportation Electrification Plan (TE Plan) pursuant to RCW § 80.28.365. The TE Plan outlines efforts that PacifiCorp is planning or considering to support transportation electrification across five categories: Named Communities Grant Program, Outreach and Education, Workplace/Multifamily Charging, Public Infrastructure Program, and Grid Integration Initiatives. The TE Plan explains that PacifiCorp is exploring the possibility of offering incentives for workplace, multifamily, and public charging applications, but does not propose any specific programs or specify the types of incentives PacifiCorp is considering. The TE Plan further states: “PacifiCorp plans to submit new program filing applications and tariffs for regulatory review on an ongoing basis and will look to incorporate these program filings into future revisions of the TE plan.”¹

¹ TE Plan, p. 55.

6. ChargePoint respectfully provides the information required by WAC § 480-07-355(1)(c) in the following paragraphs.

7. **Petitioner’s name and contact information:** ChargePoint respectfully requests that the following individuals be added to the service list for this proceeding, electronic service preferred:

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8. **Petitioner’s interest in the proceeding:** As a provider of EV charging equipment and network services, ChargePoint’s business interests will be affected by the Commission’s action with respect to PacifiCorp’s TE Plan. Specifically, whether the programs and/or rates that PacifiCorp may eventually propose pursuant to the TE Plan are approved, denied, or approved with modifications will affect the value proposition of ChargePoint’s products and services and ChargePoint’s ability to provide these products and services to customers in PacifiCorp’s Washington service territory. RCW § 80.28.360(1) provides: “The commission must consider and may adopt other policies to improve access to and promote fair competition in the provision of

electric vehicle supply equipment.” As a participant in the competitive market for EV supply equipment (and network services), ChargePoint has a substantial interest in ensuring that the activities PacifiCorp undertakes pursuant to its TE Plan promote fair competition. If PacifiCorp were to undertake activities that did not promote fair competition, ChargePoint’s ability to conduct business in PacifiCorp’s Washington service territory would be impaired. For these reasons, ChargePoint respectfully requests that the Commission find that ChargePoint’s interests may be affected by the Commission’s final order in this docket and admit ChargePoint as a party with all associated party rights.

9. **Petitioner’s position with respect to the matters in controversy:** At this time, ChargePoint has not determined its position with respect to the matters in controversy. As a general matter, ChargePoint would support PacifiCorp undertaking efforts to support transportation electrification in workplace, multifamily, and public settings as PacifiCorp has described at a high level in its TE Plan. However, program details matter. Some types of transportation electrification incentives promote fair competition as required by RCW § 80.28.360(1) while other types of incentives can distort the competitive landscape. ChargePoint will determine its position when more details of PacifiCorp’s programs are made available.

10. **Whether the petitioner proposes to broaden the issues in the proceeding:** ChargePoint does not intend to broaden the issues in this proceeding. ChargePoint’s interests as described above are within the scope of the TE Plan and the statutory considerations that govern PacifiCorp’s transportation electrification activities.

11. **The name and contact information as specified in WAC 480-07-360(3) of the persons the petitioner has authorized to act as the petitioner's representatives, including attorneys, if any:** ChargePoint has authorized Mr. Scott Dunbar, an attorney, to act as ChargePoint’s

representative in this proceeding. Mr. Dunbar is an attorney in good standing in the State of Colorado, with Colorado Bar No. 44521.

12. As a leading provider of EV charging infrastructure and network services that has participated in numerous proceedings before public service and public utility regulatory commissions around the country, ChargePoint will offer a valuable and informative perspective to the Commission through its participation in this docket. ChargePoint's participation would therefore assist the Commission in the development of a more complete record. No party will be adversely affected by ChargePoint's participation in this case. Granting ChargePoint's intervention is therefore in the public interest.

13. Because of ChargePoint's unique product and service offerings and its unique business model, ChargePoint's interest in this case is different from that of the general public.

14. For the foregoing reasons, ChargePoint respectfully requests the Commission grant this Petition to Intervene, along with any further relief the Commission deems proper.

Respectfully submitted on June 24, 2022,

/s/ Scott F. Dunbar
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