

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UE 435**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	PETITION TO INTERVENE OF CHARGEPOINT, INC.
	)	
Request for a General Rate Revision	)	

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Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), ChargePoint, Inc. (ChargePoint) petitions the Public Utility Commission of Oregon (Commission) to intervene in this proceeding.

In support of this petition, ChargePoint represents as follows:

1. The business address of ChargePoint is:

ChargePoint, Inc.  
254 East Hacienda Ave.  
Campbell, CA 95008

2. ChargePoint will not be represented by counsel in this proceeding. Mal Skowron, Regulatory Coordinator at ChargePoint, will be ChargePoint’s authorized representative.

3. ChargePoint requests that the following contacts also be served with all documents related to this proceeding (electronic service preferred):

Mal Skowron  
Regulatory Coordinator  
ChargePoint, Inc.  
254 East Hacienda Ave.  
Campbell, CA 95008  
908-307-1972  
[mal.skowron@chargepoint.com](mailto:mal.skowron@chargepoint.com)

4. 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.

5. 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.

6. 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.

7. The nature and extent of ChargePoint's interest in this proceeding is to determine the impact of Portland General Electric's (PGE) various rate proposals on EV charging and transportation electrification. Specifically, PGE has proposed to revise Schedule 50, which sets forth the prices PGE charges EV drivers at PGE-owned public chargers, to charge per-kWh fees instead of the flat fees and membership fees PGE currently charges through Schedule 50. ChargePoint supports PGE's proposed transition to per-kWh fees. If granted party status in this proceeding, ChargePoint will investigate and present evidence on whether the specific per-kWh fees PGE proposes reflect market rates that mitigate potential impacts on the competitive market for public EV charging services.

8. The issues that ChargePoint plans to raise in this proceeding include the following:
- a. Whether PGE's proposed changes to Schedule 50 result in rates that are just, reasonable, and in the public interest;
  - b. Whether PGE's other rate proposals that impact EV charging and transportation electrification are just, reasonable, and in the public interest;

9. As a leading provider of EVSE and electric vehicle charging and network services, ChargePoint will bring unique knowledge of the EV charging industry to this proceeding. In addition to its industry expertise, ChargePoint has extensive experience working on transportation electrification issues in other states and will provide the Commission with valuable insights and lessons learned through its participation in this proceeding. The unique knowledge and expertise that ChargePoint will bring to this proceeding will assist the Commission with evaluating PGE's rate proposals. ChargePoint has participated in previous dockets before the Commission, including

dockets UM 1811, UM 1810, ADV 485, AR 599, UM 2033, UM 2035, UE 374, and UM 2056 and will bring its experience and expertise developed in these dockets to bear in this proceeding.

10. ChargePoint's participation in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

11. ChargePoint has a direct and substantial interest in this proceeding and its interests cannot be adequately represented by any other party. It is in the public interest to grant ChargePoint's petition to intervene in this proceeding.

For all the reasons stated herein, ChargePoint respectfully requests that the Commission grant its petition to intervene in this proceeding.

Respectfully submitted on March 25, 2024,

BY: /s/ Mal Skowron  
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