BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

Docket No. ADV 1288

In the Matter of)	
PACIFICORP D/B/A PACIFIC POWER)	
Advice No. 21-016 Transportation)	PETITION TO INTERVENE OF
Electrification Residential Charging Pilot, –)	CHARGEPOINT, INC.
Schedule 117, Transportation Electrification)	
Nonresidential Charging Pilot – Schedule)	
118, Transportation Electrification Outreach)	
and Education Pilot)	

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 be represented by:

Steve Elzinga, OR Bar No. 123102 Sherman Sherman Johnnie & Hoyt, LLP 693 Chemeketa St. NE Salem, OR 97301

Telephone: 503-364-2281 Email: steve@shermlaw.com

Scott Dunbar Keyes & Fox LLP 1580 Lincoln St., Suite 1105 Denver, CO 80203

Phone: 949-525-6016

Email: sdunbar@keyesfox.com

Mr. Dunbar, an attorney in good standing in the State of Colorado, is currently awaiting a

Certificate of Good Standing from the Colorado Supreme Court and will file a Motion to Appear

Pro Hac Vice and related documents as soon as it is received.

3. ChargePoint requests that the following contacts also be served with all documents related

to this proceeding (electronic service preferred):

Jared Ballew

Utility Policy Coordinator

ChargePoint, Inc.

254 East Hacienda Ave.

Campbell, CA 95008

Phone: 1.515.338.0506

Email: jared.ballew@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.

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- 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 evaluate PacifiCorp's (d/b/a Pacific Power) proposed new transportation electrification pilot programs. PacifiCorp's proposals will directly affect the value proposition for purchasing EVs and installing EV charging stations for customers in PacifiCorp's Oregon service territory, including ChargePoint's products and services. As a provider of EV charging equipment and network services, ChargePoint's ability to qualify its equipment for inclusion in PacifiCorp's proposed programs will directly affect ChargePoint's ability to sell its products and services in PacifiCorp's service territory. ChargePoint's tangible and pecuniary interests will be directly affected by the outcome of this proceeding.
- 8. The issues that ChargePoint plans to raise in this proceeding include whether PacifiCorp's proposed programs are consistent with statutory and regulatory requirements, whether PacifiCorp's proposed incentives will support competition and customer choice, and whether

PacifiCorp's proposed criteria for its Qualifying Products List are appropriate and support the competitive market. ChargePoint respectfully reserves the right to raise additional issues that may be discovered during the discovery process and further review of PacifiCorp's application and proposed tariffs.

- 9. As a leading provider of EVSE and electric vehicle charging and network services, ChargePoint will bring special 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 special knowledge and expertise that ChargePoint will bring to this proceeding will assist the Commission with evaluating PacifiCorp's proposals. ChargePoint has participated in previous dockets before the Commission, including dockets UM 1811, UM 1810, ADV 485, AR 599, UM 2033, UM 2035, and UE 374, 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 July 30, 2021,

BY: /s/ Steve Elzinga
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