BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

Docket No. UM 2035

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In the Matter of IDAHO POWER COMPANY

PETITION TO INTERVENE OF CHARGEPOINT, INC.

2019 Transportation Electrification Plan

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. Alexandra Leumer,

Director, Public Policy 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):

Alexandra Leumer Director, Public Policy ChargePoint, Inc. 254 East Hacienda Ave. Campbell, CA 95008 Phone: 415-609-9165 Email: alexandra.leumer@chargepoint.com Renee Samson Director, Utility Solutions ChargePoint, Inc. 254 East Hacienda Ave. Campbell, CA 95008 Phone: (415) 297-4360 Email: renee.samson@chargepoint.com

Scott F. Dunbar Keyes & Fox LLP 1580 Lincoln St., Suite 880 Denver, CO 80203 Phone: 949-525-6016 Email: sdunbar@keyesfox.com

4. Founded in 2007, ChargePoint is the nation's leading electric vehicle (EV) charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 103,000 independently owned charging spots, ChargePoint drivers have completed more than 66 million charging sessions, saving upwards of 73 million gallons of gasoline and driving more than 1.7 billion gas-free miles.

5. The nature and extent of ChargePoint's interest in this proceeding is to provide comments on Idaho Power Company's transportation electrification plan, as permitted by OAR § 860-087-0020(2)(c). As a provider of EV charging stations and network services, ChargePoint's business activities in Idaho Power's service territory are affected by the "portfolio of actions" that Idaho Power undertakes with respect to transportation electrification, all of which must be described in Idaho Power's Transportation Electrification Plan pursuant to OAR § 860-087-0020(1).

- 6. The issues that ChargePoint plans to raise in this proceeding include the following:
 - a. Whether Idaho Power's Transportation Electrification Plan meets the requirements of OAR § 860-087-0020;
 - b. Whether the Commission should accept the Transportation Electrification Plan.

7. 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 Idaho Power's Transportation Electrification Plan. ChargePoint has participated in previous transportation electrification dockets before the Commission, including dockets UM 1811, UM 1810, ADV 485, AR 599, and UM 2033 and will bring its experience and expertise developed in these dockets to bear in this proceeding.

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

9. 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 November 25, 2019,

BY: /s/ Alexandra Leumer Alexandra Leumer Director, Public Policy ChargePoint, Inc. 254 East Hacienda Ave. Campbell, CA 95008 Phone: 415-609-9165 Email: alexandra.leumer@chargepoint.com

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