

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1811

In the Matter of)	RESPONSE OF CHARGEPOINT,
Portland General Electric’s Application for)	INC. TO PGE’S OPPOSITION TO
Transportation Electrification Programs)	PETITION TO INTERVENE BY
)	ELECTRIC VEHICLE CHARGING
)	ASSOCIATION

ChargePoint, Inc. (ChargePoint) hereby files this response to PORTLAND GENERAL ELECTRIC’S OPPOSITION TO PETITION TO INTERVENE BY ELECTRIC VEHICLE CHARGING ASSOCIATION (PGE’s Opposition). PGE’s Opposition mentions ChargePoint by name several times. ChargePoint believes it is important to make several clarifications regarding ChargePoint’s relationship to the Electric Vehicle Charging Association (EVCA) and that these clarifications will benefit the evidentiary record in this docket. ChargePoint supports EVCA’s intervention and participation in this proceeding.

I. EVCA is a non-profit industry association representing diverse members whose interests can and do diverge from ChargePoint’s.

ChargePoint is a founding member of EVCA, but ChargePoint did not found EVCA on its own, as PGE’s Opposition implies. Further, PGE’s Opposition incorrectly assumes that the interests of EVCA and each of EVCA’s members are identical.

As a non-profit industry association, EVCA can only take positions that are supported by each of its members. PGE is simply incorrect in asserting, without any evidence or supporting rationale, that “EVCA’s intervention is an attempt by ChargePoint to now broaden the issues

(given the settlement) and delay the proceeding.” Not only does PGE’s Opposition ignore EVCA’s clear statement in its intervention that it does not intend to broaden the issues in this docket or delay the proceeding, it unfairly and inaccurately accuses ChargePoint of trying to do so through EVCA. As a member of EVCA, ChargePoint support’s EVCA’s intervention, but EVCA has sought to intervene with the support of all of its members. The positions and actions that EVCA takes through participation in this docket will also require the support of all of its members.

II. ChargePoint’s participation in this docket is not a substitute for EVCA’s participation.

PGE’s Opposition also argues that EVCA’s participation is not necessary because ChargePoint is participating in this docket and because two EVCA members signed a letter that was attached to Forth’s Reply Testimony.

First, the fact that two EVCA members signed a letter of support for PGE’s application is further evidence that the interests of ChargePoint and the interests of EVCA are not identical. ChargePoint has consistently opposed PGE’s application because it does not stimulate innovation, competition, and customer choice, as required by SB 1547.

Second, PGE’s Opposition seems to assume that because the industry perspective of EVCA members is similar to ChargePoint, that “EVCA’s participation will not materially add new or different information to the docket.” Adding new or different information to a docket is not a requirement that a prospective intervenor must meet in order be granted party status; rather, the Commission or ALJ “must grant” EVCA’s petition to intervene if the Commission or ALJ finds that EVCA has a sufficient interest and that EVCA’s intervention “will not unreasonably broaden the issues, burden the record, or delay the proceeding.” OAR 860-001-0300(6). Further, EVCA’s participation will benefit the record in this docket by bringing the perspective of additional electric

vehicle charging supply equipment (EVSE) providers. As discussed above, just because EVCA members have similar industry perspectives as EVSE suppliers does not mean that all EVCA members will take the same position on a given issue. By bringing the perspectives and positions of numerous industry players, EVCA's participation in this docket will help the Commission to reach a decision that comports with the law and is in the public interest.

For the reasons discussed herein, ChargePoint recommends that the Commission grant the EVCA's Petition to Intervene.

Respectfully submitted this 20th day of June, 2017,

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