

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1810

In the Matter of)	Cross Examination Statement
Pacificorp d/b/a Pacific Power Application)	Of ChargePoint, Inc.
for Transportation Electrification Programs)	
)	

Pursuant to the Administrative Law Judge’s September 13, 2017 procedural order, ChargePoint, Inc. (ChargePoint) hereby files its cross-examination statement.

While important factual disputes remain in this docket, ChargePoint now considers the record in this docket to be sufficiently robust for the Commission to make the necessary findings of fact and determinations of law without the need for a hearing. Therefore, out of respect for the time and resources of the Commission and the other parties to this docket, ChargePoint hereby withdraws its request for a hearing in this docket.

ChargePoint does not intend to ask any cross-examination questions of other witnesses in this docket but, if the Administrative Law Judge or the Commission find that a hearing in this case is necessary, ChargePoint would respectfully reserve its right to ask follow-up questions of any witness who is questioned by another party, the Administrative Law Judge, or any Commissioner.

ChargePoint plans to move into the record of this proceeding ChargePoint’s response to OPUC Staff Data Request 23, which is attached hereto. Counsel for Staff has represented to ChargePoint that Staff does not object to the admission of this data response into the record. ChargePoint respectfully reserves the right to move into the record responses to any data requests

that are received subsequent to the filing of this Cross Examination Statement, but hereby states that it is not expecting any additional data request responses at this time.

Respectfully submitted this 6th day of November, 2017,

BY: /s/ Scott F. Dunbar
Scott F. Dunbar
Keyes & Fox LLP
1580 Lincoln St., Suite 880
Denver, CO 80203
Office: 720-216-1184
Mobile: 949-525-6016
sdunbar@kfwlaw.com

Counsel for ChargePoint, Inc.

Staff-23. Please provide the following data and/or information:

- a. Usage information for each of ChargePoint's DC Fast Chargers in Oregon, and within PacifiCorp's Oregon service territory;
- b. A list of the type of information generated from each site that ChargePoint shares with the utility providing electricity to the sites;
- c. A list of the type of information ChargePoint does not share with the utility; and
- d. Indicate how often (at what intervals) information is shared with the utility.

Response:

ChargePoint objects to Staff-23(a) because it seeks information that is confidential subject to ChargePoint's contractual agreements with its customers. It is highly prejudicial and unduly burdensome to require ChargePoint to breach its customer agreements by providing confidential information that is protected pursuant to such customer agreements. ChargePoint would be in breach of such customer agreements even if it were to provide such customer agreements under a protective order.

Notwithstanding and without waiving the above objection, ChargePoint responds as follows:

a. As noted in the objection, ChargePoint is unable to provide this information as it would violate our existing customer agreements. However, utility ownership of EVSE is not required for a utility to obtain this information for station deployed through a utility program. ChargePoint would be able to modify its customer agreements for a utility program if required to provide this information for stations deployed through that program.

b. ChargePoint would support any utility program that included as a condition of customer participation, the following information being shared with the utility:

- Station Utilization
- Energy Usage
- Real Time Power
- Peak Power Curves
- Unique Drivers
- Average Session Length
- Avoided Greenhouse Gas Emissions

c. See the response to part b, above.

d. ChargePoint stations collect and are capable of sharing information on a real-time basis (i.e., <1 min intervals).

Sponsor: David Packard

Sponsor of objections: Scott Dunbar

Date: October 23, 2017