

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 1810**

In the Matter of	)	CHARGEPOINT, INC.'S MOTION
Pacificorp d/b/a Pacific Power Application	)	TO ADMIT PRE-FILED
for Transportation Electrification Programs	)	TESTIMONY AND AFFIDAVITS
	)	OF WITNESSES

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ChargePoint, Inc. (ChargePoint) hereby files this motion to admit its pre-filed testimony and exhibits into the record of this docket.

ChargePoint respectfully moves for admission of the following prefiled testimony and exhibits into the record of this proceeding:

- ChargePoint/100, Reply Testimony of David Packard;
- ChargePoint/200, Testimony Opposing Stipulation of David Packard;
- ChargePoint/300, Testimony Opposing Stipulation of Anne Smart;
- ChargePoint/400, ChargePoint Response to OPUC Staff Data Request 23, which is attached hereto.<sup>1</sup>

Attached to this Motion are affidavits of ChargePoint's witnesses Mr. David Packard and Ms. Anne Smart attesting to the truthfulness of their pre-filed testimony, ChargePoint Exhibits 100, 200, and 300.

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<sup>1</sup> As stated in ChargePoint's Cross Examination Statement, filed November 6, 2017, Staff does not object to the admission of this data request into the record of this docket.

ChargePoint also intends that its Objections to Stipulation and Request for Hearing filed on August 25, 2017, pursuant to OAR 860-001-0350(8), in this proceeding be a part of the record in this proceeding.

Respectfully submitted this 14<sup>th</sup> day of December, 2017,

BY: /s/ Scott F. Dunbar

Scott F. Dunbar

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Counsel for ChargePoint, Inc.

## ChargePoint Responses to OPUC Staff Data Requests 1-25

**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).

ChargePoint Responses to OPUC Staff Data Requests 1-25

**Sponsor:** David Packard

**Sponsor of objections:** Scott Dunbar

**Date:** October 23, 2017

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**Docket No. UM 1810**

In the Matter of )  
Pacificorp d/b/a Pacific Power Application ) Affidavit of Anne Smart  
for Transportation Electrification Programs )

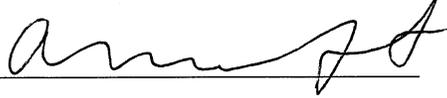
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I, Anne Smart, being duly sworn, depose and state:

1. My name is Anne Smart. I am employed by ChargePoint, Inc. (ChargePoint) as Vice President of Public Policy.
2. I am the same Anne Smart that provided written testimony on behalf of ChargePoint in this proceeding. My testimony was designated as Testimony Opposing Stipulation (ChargePoint/300).
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my responses would be the same.

Signed this 4 day of December, 2017.



A handwritten signature in cursive script, appearing to read 'Anne Smart', is written over a horizontal line.

Anne Smart

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*A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.*

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )  
County of Santa Clara )  
On December 4, 2017 before me, Kristina Brown, Notary Public,  
Date Here Insert Name and Title of the Officer  
personally appeared Anne Smart  
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Kristina Brown  
Signature of Notary Public

Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_  
Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian or Conservator  
 Other: \_\_\_\_\_  
Signer Is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian or Conservator  
 Other: \_\_\_\_\_  
Signer Is Representing: \_\_\_\_\_

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 1810**

In the Matter of )  
Pacificorp d/b/a Pacific Power Application ) Affidavit of David Packard  
for Transportation Electrification Programs )

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I, David Packard, being duly sworn, depose and state:

1. My name is David Packard. I am employed by ChargePoint, Inc. (ChargePoint) as Vice President of Utility Solutions.
2. I am the same David Packard that provided written testimony on behalf of ChargePoint in this proceeding. My testimony was designated as Reply Testimony (ChargePoint/100), and as Testimony Opposing Stipulation (ChargePoint/200).
3. To the best of my knowledge, my pre-filed testimony is true and accurate. If I were asked the same questions today, my responses would be the same.

Signed this 13<sup>th</sup> day of Deco 2017  
December, 2017



David Packard

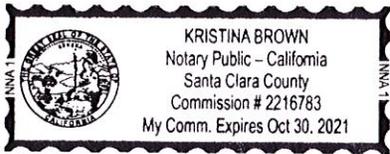
*A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.*

State of California

County of Santa Clara

Subscribed and sworn to (or affirmed)  
before me on this 13 day of December,  
2017, by

David Packard



Proved to me on the basis of satisfactory evidence  
to be the person who appeared before me.



Signature of Notary

Notary Public, State of California

My Commission expires: Oct 30, 2021