

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UE 374

In the Matter of)	
PACIFICORP d/b/a PACIFIC POWER)	PETITION TO INTERVENE OF CHARGEPOINT, INC.
Request for a General Rate Revision)	

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
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4. 1) ChargePoint is the world’s largest electric vehicle (EV) charging network with more than 110,000 Level 2 and direct current fast EV charging spots, including 719 ports in Oregon. ChargePoint designs, develops, and deploys residential and commercial AC Level 2 (L2) and DC fast charging (DCFC) electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem. ChargePoint sells EV charging equipment (or electric vehicle supply equipment, EVSE) and network services that enable EV charging station owners to provide charging services. In almost every case, ChargePoint does not own or operate the equipment. ChargePoint sells charging solutions to a wide variety of customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, and multi-unit dwelling owners to serve light, medium or heavy-duty electric vehicles.

5. The nature and extent of ChargePoint’s interest in this proceeding is to determine the impact of Pacific Power’s various rate proposals on EV charging and transportation electrification. Pacific Power has proposed to modify Schedule 4 to reduce the differential between the two existing pricing tiers. Pacific Power states that one rationale for its proposed modifications to Schedule 4 is that the current tier structure makes residential EV charging more expensive.¹ Second, Pacific Power has also proposed to introduce Schedule 6, which is a residential time-of-

¹ PAC/1400, Meredith/36.

use pilot that would be available to residential customers that own EVs. Third, Pacific Power has proposed to introduce Schedule 29, which is a non-residential time-of-use pilot that Pacific Power states is designed in part to accommodate low-load factor customers such as DC fast chargers.² These rate proposals will directly affect the value proposition for customers of purchasing EVs and installing EV charging stations. As a provider of EV charging equipment and network services, Pacific Power's rate proposals will directly affect ChargePoint's ability to conduct business in Pacific Power's service territory.

6. The issues that ChargePoint plans to raise in this proceeding include the following:
 - a. Whether Pacific Power's proposed changes to Schedule 4 result in rates that are just, reasonable, and in the public interest;
 - b. Whether Pacific Power's proposed Schedule 6 is just, reasonable, and in the public interest; and
 - c. Whether Pacific Power's proposed Schedule 29 is just, reasonable, and in the public interest.

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 Pacific Power's rate proposals. ChargePoint has participated in previous dockets before the Commission,

² PAC/1400, Meredith/55-56.

including dockets UM 1811, UM 1810, ADV 485, AR 599, UM 2033, and UM 2035 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 March 9, 2020,

BY: /s/ Alexandra Leumer
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