

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Docket No. UM 1810**

In the Matter of	)	PETITION TO INTERVENE OF
Pacificorp Transportation Electrification	)	CHARGEPOINT, INC.
Outreach and Education Pilot Program	)	

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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 with full party status as described in OAR § 860-001-0010(7). 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 be represented in this proceeding by Keyes & Fox LLP. All documents related to this proceeding should be served on ChargePoint’s attorney at the following address:

Scott F. Dunbar  
Keyes & Fox LLP  
1580 Lincoln St., Suite 880  
Denver, CO 80203  
Phone: 720-216-1184  
Mobile: 949-525-6016  
Email: [sdunbar@kfwlaw.com](mailto:sdunbar@kfwlaw.com)

3. ChargePoint requests that the following contacts also be served with all documents related to this proceeding:

Anne Smart  
ChargePoint, Inc.  
254 East Hacienda Ave.  
Campbell, CA 95008  
Phone: 408-858-5076  
Email: [anne.smart@chargepoint.com](mailto:anne.smart@chargepoint.com)

Amanda Dalton  
Dalton Advocacy, Inc.  
8 N. State Street Suite 103  
Lake Oswego, OR 97034  
Phone: 503-884-0415  
Email: [amanda@daltonadvocacy.com](mailto:amanda@daltonadvocacy.com)

4. Founded in 2007, ChargePoint is the world's largest and most open electric vehicle charging network with more than 31,600 total charging spots and 400 Express DC fast locations, including 442 charging locations in Oregon. ChargePoint designs, develops, and deploys Level 2, DC fast charging, and high speed fast charging electric vehicle charging stations, software applications, and data analytics aimed at creating successful, scalable, and grid-friendly electric vehicle service equipment (EVSE).

5. The nature of ChargePoint's interest in this proceeding is to ensure that Pacificcorp's, d/b/a Pacific Power, proposed Transportation Electrification Outreach and Education Pilot proposal is in the public interest and will stimulate innovation, competition, and customer choice with respect to electric vehicle charging services and infrastructure, as required by SB 1547. ChargePoint's interest in this proceeding extend to all aspects of Pacific Power's proposed program that involve deployment and operation of EVSE or the provision of electric vehicle charging services. ChargePoint has a substantial interest in this proceeding because its ability to conduct business in

Oregon and Pacific Power's service territory will be substantially affected by the parameters of Pacific Power's program that will be decided by the Commission in this proceeding.

6. The issues that ChargePoint plans to raise in this proceeding include the following:

- a. Whether Pacific Power's Outreach and Education Pilot proposal will be in the public interest;
- b. Whether Pacific Power's proposal will stimulate innovation, competition, and customer choice with respect to electric vehicle charging services and infrastructure;
- c. Whether Pacific Power's proposal and planned related expenditures are prudent;
- d. Whether Pacific Power's proposal can be reasonably expected to achieve the goals of SB 1547;
- e. Any other issues related to Pacific Power's proposal that ChargePoint discovers through the course of this proceeding that warrant consideration by the Commission.

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 be able to 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 resolving the issues in this proceeding.

8. ChargePoint's appearance and 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. ChargePoint's interests will be affected by the Commission's final determination in this proceeding. 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 with full party status in this proceeding.

Respectfully submitted on February 2, 2017,

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