

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 20-170

ELECTRIC DISTRIBUTION UTILITIES

Electric Vehicle Time of Use Rates

PETITION TO INTERVENE OF CHARGEPOINT, INC.

ChargePoint, Inc. (“ChargePoint”) respectfully petitions to intervene in the above-captioned proceeding, pursuant to the September 16, 2020 Order of Notice and N.H. Admin. Rules Puc 203.17 and in accordance with the standards set forth at RSA 541-A:32. The Commission has opened this proceeding to, among other things, facilitate the development and review of utility-specific electric vehicle (“EV”) time of use (“TOU”) rate proposals.¹ The proceeding raises issues related to whether the EV TOU rate proposals that New Hampshire’s investor-owned utilities have been directed to develop and file in this proceeding are consistent with the rate design standards delineated in Order No. 26,394, are likely to result in just and reasonable electric rates, and are consistent with New Hampshire Energy policy found at RSA 378:37.² ChargePoint has a substantial interest in and will be affected by the development and implementation of EV rate designs in New Hampshire, therefore ChargePoint seeks full rights as an intervenor in this proceeding.

In support of its petition to intervene, ChargePoint states as follows:

New Hampshire Code of Administrative Rules Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-

¹ Order of Notice at 1.

² *Id.*

A:32 provides that a petition to intervene shall be granted when a petitioner demonstrates that it has “rights, duties, privileges, immunities or other substantial interests” that may be affected by the proceeding, and “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.” As described below, ChargePoint has substantial interests that will be affected by the outcome of this proceeding. ChargePoint therefore respectfully requests that the Commission grant this petition to intervene.

In Order No. 26,394, issued on August 18, 2020 in Docket No. IR 20-004, the Commission directed that the instant proceeding be opened, stating: “we find electric vehicle time of use rates are an appropriate rate design for residential and commercial customers, and we believe a separate proceeding to adjudicate the merits of various proposals from each utility is warranted.”³ The Commission further directed that, “[a]ny proposals filed in this future proceeding should include testimony, projected costs, and be accompanied by illustrative tariff language.”⁴ The Commission adopted Staff’s recommendation that the utilities be asked to file separate rate design proposals for “residential and small commercial customers” and also for “high demand draw applications that may incorporate direct current fast charging or clustered level two chargers.”⁵ The Commission stated “[w]e expect that utilities will consider demand charge alternatives in any high demand draw rate design proposals they may develop.”⁶ Also in Order No. 26,394, the Commission directed Staff to continue to develop the concept of feasibility assessments related to alternative metering, with the input of the parties, “in the initial stage of any adjudicative proceeding that may follow.”⁷

³ Order No. 26,394 at 18.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.* at 9.

⁷ *Id.* at 13-14.

Accordingly, the Commission has opened this proceeding to develop and review utility-specific EV TOU rate proposals and related issues.⁸

ChargePoint's rights, duties, privileges, immunities, and other substantial interests will be affected by the decisions made in this proceeding. ChargePoint is one of the world's largest EV charging networks, with scalable solutions for charging at home, work, around town, and on the road. ChargePoint's network offers more than 120,000 places to charge, including more than 250 charging spots in New Hampshire, and those numbers continue to grow. With customers that include workplaces, cities, retailers, apartments, hospitals, and vehicle fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data. On the ChargePoint network, drivers have completed more than 84 million charging sessions, saved upwards of 102 million gallons of fuel, and driven more than 2.5 billion electric miles.

ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. Hardware offerings include Level 2 ("L2") and DC fast charging products, and ChargePoint provides a range of options across those charging levels for specific use cases including light and medium duty and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. ChargePoint's products are UL-listed,

⁸ See Order of Notice at 1.

ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

As a provider of Level 2 chargers, DC fast chargers, and EV charging network services in New Hampshire with existing customers as well as prospective customers seeking to install and operate EV charging stations in the state, ChargePoint's business interests will be substantially affected by the EV rate designs and other EV-related policies that may be developed in this proceeding, including EV TOU rates, demand charge alternatives, and metering policies. In addition, ChargePoint offers experience with and knowledge of EV rate design and policy options that have been considered and adopted in other New England jurisdictions and across the country, as well as technology options including alternative metering technologies. ChargePoint provided several sets of comments and participated productively in Docket No. IR 20-004, *Investigation into Rate Design Standards for Electric Vehicle Charging Stations and Electric Vehicle Time of*

Day Rates, and looks forward to continuing to provide stakeholder input and industry expertise on related EV rate design issues in this proceeding. ChargePoint also recently provided oral and written testimony on EV issues in Docket No. DE 19-057, Eversource Energy's electric rate case. ChargePoint's participation is in the public interest and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, ChargePoint, Inc. respectfully requests that the Commission grant its petition to intervene in Docket No. DE 20-170.

Respectfully submitted,



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