

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 21-030

Unitil Energy Systems, Inc.

Request for Change in Rates

PETITION TO INTERVENE OF CHARGEPOINT, INC.

ChargePoint, Inc. (“ChargePoint”) respectfully petitions for intervention in the above-captioned proceeding, pursuant to the April 6, 2021 Order Suspending Tariff and Scheduling Prehearing Conference, Order No. 26,467 (“Order”), N.H. Admin. Rules Puc 203.17, and in accordance with the standards of RSA 541-A:32. In the Order, the Public Utilities Commission (“Commission”) suspended the proposed tariff for temporary and permanent rate increases of Unitil Energy Systems, Inc. (“Unitil”) pending further investigation. The Commission directed interested parties to seek intervention by April 19, 2021.

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-A:32 provides that a petition to intervene shall be granted if the petitioner demonstrates that they have “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 demonstrated herein, ChargePoint has substantial interests that will be affected by the outcome of this proceeding and its intervention will not impair the interests of justice or the orderly and prompt resolution of this matter. ChargePoint therefore respectfully requests that the Commission grant this petition.

The Commission’s Order states that part of the purpose of this proceeding is to examine whether Unitil’s rate proposals are consistent with Order No. 26,394 (August 18, 2020), *Order Determining the Appropriateness of Rate Design Standards for Electric Vehicle Charging Stations Pursuant to SB 575*, and to determine whether planned capital investments are just, reasonable, and lawful.¹ Unitil’s request includes several rate and capital investment proposals that concern electric vehicles (“EV”) and electric vehicle supply equipment (“EVSE”). These include: (1) a program to incentivize residential customers to purchase and install smart Level 2 (“L2”) EV chargers for home charging; (2) a make ready capital investment program; (3) a suite of time-of-use (“TOU”) rate offerings including a domestic whole-house TOU rate, a domestic EV TOU rate, a small general service EV TOU rate, and a large general service EV TOU rate; and (4) a marketing and outreach plan related to these EV programs.² ChargePoint’s interests are at stake in each of these proposals.

ChargePoint is a world-leading EV charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and transport fleets of all types. ChargePoint’s cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint’s hardware offerings include L2 and DC fast charging (“DCFC”) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, 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 EV charging station site hosts to manage charging onsite with features like

¹ Order at 4.

² See generally Testimony of Carroll, Simpson, and Valianti.

Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed and CE (EU) certified, while L2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, 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.

In New Hampshire, ChargePoint has deployed hundreds of EV charging stations throughout the state. In addition to its commercial activities, ChargePoint has contributed to multiple Commission dockets including:

- the Commission's investigation in Docket No. IR 15-510, Investigation into Resale of Electricity by Electric Vehicle Charging Stations;
- the rate case of Eversource Energy, Docket No. DE 19-057, which recently resulted in a settlement to which ChargePoint was a signatory;
- the Commission's investigation in Docket No. IR 20-004, which resulted in Order No. 26,394 (August 18,2020), *Order Determining the Appropriateness of Rate Design Standards for Electric Vehicle Charging Stations Pursuant to SB 575*, the implementation of which the Commission states is at interest in this proceeding; and

- ongoing proceeding DE 20-170, regarding EV TOU rates and other issues, to which the instant Unitil proposal also relates.

ChargePoint additionally provided presentations and technical assistance to the Electric Vehicle Charging Stations Infrastructure Commission (“EV Commission”) established by SB 517 in 2018. Kevin Miller, Director of Public Policy for ChargePoint, served as a member of the EV Commission.

As a provider of L2 EV chargers, DC fast chargers (“DCFCs”), and EV charging network services in New Hampshire which has existing customers as well as prospective customers seeking to install EV charging stations in Unitil’s service territory, ChargePoint has a direct and substantial interest in Unitil’s proposal to invest in make-ready infrastructure projects. The cost of make-ready infrastructure projects is often a significant portion of the total cost of providing EV charging services. Therefore, a well-designed make-ready program can positively impact the expansion of transportation electrification in the state and region. ChargePoint also has an interest in Unitil’s rate design proposals, which target EV users in various customer segments. Such rate designs are likely to affect both the use and pace of adoption of EVs and EVSE in Unitil’s New Hampshire service territory. ChargePoint has a further interest in the EV charger incentive program that Unitil proposes for residential customers, as ChargePoint offers the Home Flex L2 residential smart charging solution. The outcome of this proceeding will thus substantially affect multiple pecuniary and tangible interests of ChargePoint across market sectors. As such, ChargePoint’s rights, duties, privileges, or other substantial interests will be directly affected by this proceeding. RSA 541-A:32(b).

ChargePoint’s interests are unique and will not be fully addressed by the intervention of other parties in this proceeding. ChargePoint’s interests in this docket are focused on issues concerning transportation electrification, whereas other parties may have additional unrelated

interests. At the same time, ChargePoint's pecuniary and tangible interests in Unitil's EV-related proposals are diverse and thus are likely to be unique among other intervenors who are also interested in transportation electrification. Furthermore, the depth of expertise that ChargePoint can offer in the area of EV infrastructure and related policy issues is extensive and can be valuable to the Commission in its careful deliberations and just resolution of the EV-related proposals before it.

ChargePoint's participation will focus on the subject of transportation electrification and related rates, investments, programs, and practices. For example, ChargePoint is interested to ensure that Unitil's make ready investment proposal is consistent with the following general guiding principles applicable to such investments:

- minimizing costs and maximizing benefits to all ratepayers;
- enabling customer choice in EV charging equipment and services;
- promoting competition;
- providing support for EV adoption across all income levels;
- attracting and leveraging private investment; and
- promoting innovation.

Although ChargePoint is continuing to review and investigate the details of Unitil's EV-related proposals, ChargePoint supports Unitil's efforts to bring forward these important proposals and is optimistic that the outcome of this proceeding will contribute positively to advancing transportation electrification in the state.

ChargePoint's intervention will have no negative impact on the timely resolution of this proceeding and will not prejudice other parties.

In conclusion, ChargePoint's participation is in the interests of justice and the orderly and prompt conduct of the proceeding and will neither delay nor disrupt this proceeding. RSA 541-A:32(c).

WHEREFORE, ChargePoint, Inc. respectfully requests that the Commission grant its petition to intervene in Docket No. DE 21-030.

Respectfully submitted,



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Dated April 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition and Appearance have, on this 19th day of April 2021, been sent by email to the service list in Docket No. DE 21-030.



Melissa E. Birchard