

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2018-3000164
	:	
v.	:	
	:	
PECO Energy Company	:	

**PETITION TO INTERVENE  
OF CHARGEPOINT INC.**

Pursuant to 52 Pa. Code §§ 5.71 et. seq., ChargePoint, Inc. (ChargePoint), hereby petitions to intervene in the above-captioned proceeding, out of time, for good cause shown. In support of this Petition, ChargePoint states as follows:

1. On March 29, 2018, PECO Electric Company (PECO or the Company) filed with the Pennsylvania Public Utility Commission (Commission) Tariff Electric – Pa. P.U.C. No. 6 (Tariff No. 6). Tariff No. 6 reflects an increase in annual distribution revenue of approximately \$82 million, or 2.2% of PECO’s total Pennsylvania jurisdictional operating revenues. PECO’s filing also includes a proposed Electric Vehicle Direct Current Fast Charging (DCFC) Pilot Rider (EV-FC). Under the proposed rider, PECO would apply a demand (kW) credit, available for a 30-month term, equal to 50% of a DCFC’s nameplate capacity rating for customers who install a publicly available DCFC served under rates GS, PD or HT.

2. ChargePoint is the world’s largest and most open electric vehicle (EV) charging network, with over 51,000 independently owned and operated Level 2 and DC fast charging spots, including stations deployed throughout Pennsylvania and in the service territory of PECO.

3. Nationwide, ChargePoint has thousands of customers, including major employers, municipalities, universities, real estate developers and parking garage facility owners and operators providing EV charging and related services to EV drivers. Stations in ChargePoint's network are almost exclusively owned and operated by these EV charging station site hosts, which provide EV charging services to EV drivers.

4. ChargePoint is an active participant in the Commission's Third Party Electric Vehicle Charging - Resale/Distribution proceedings in Docket No. M-2017-2604382 and strongly supports a statewide regulatory approach to complement and accelerate the competitive EV charging market and advance transportation electrification throughout Pennsylvania in an equitable, efficient, and sustainable manner.

5. ChargePoint's interests are substantially different from those of any other party to the proceeding. Specifically, ChargePoint's current and future customers of DCFC hardware and network services would be impacted by PECO's proposed Electric Vehicle DCFC Pilot Rider (EV-FC). ChargePoint seeks to provide evidence and information in this proceeding with respect to the technological, economic, rate design, equity, and other issues related to the impact of PECO's proposed Electric Vehicle DCFC Pilot Rider on independent operators of EV charging facilities, hardware and network service providers, drivers, and riders. ChargePoint has not yet determined its position on PECO's proposal. Determining whether ChargePoint opposes, supports, or supports modifications to the proposal requires further investigation, including discovery, in this proceeding.

6. In its efforts to comply with PA PUC Rule 1.22, until recently, ChargePoint was unable to secure Pennsylvania legal counsel, without conflicts, to represent ChargePoint in this proceeding despite diligent efforts to do so. As a result, ChargePoint was unable to participate in the May 8, 2018 initial prehearing conference in this matter. However, ChargePoint has since secured local counsel and intervention by ChargePoint will not cause confusion or delay the conclusion of this proceeding. ChargePoint's intervention will clarify certain issues and contribute to the development of a complete record based on its unique, significant interests, which, as noted above, are substantially different from those of any other party to the proceeding. Moreover, ChargePoint will not seek to delay the proceeding in any manner and hereby agrees to accept the schedule established in Prehearing Order #1, issued on May 10, 2018.

7. ChargePoint has engaged, and will be represented in this case by:

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<sup>1</sup> Mr. Dunbar is an attorney licensed to practice law in the State of Colorado. Simultaneous with this Petition to Intervene, ChargePoint is filing a Motion for Admission *Pro Hac Vice* for Mr. Dunbar accompanied by the required statements and verifications.

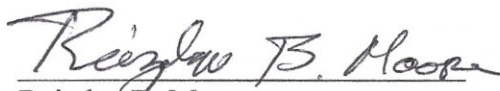
8. Pursuant to 52 Pa. Code § 1.54(b)(3), Messrs. Moore and Dunbar consent to the electronic service of all documents at the e-mail address shown above.

9. No other party to this proceeding represents the interests of ChargePoint and its customers in the PECO service territory.

10. ChargePoint intends to actively participate in this proceeding on such matters that affect its interest and the interest of its customers in PECO's service territory. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by PECO and other parties to this proceeding.

WHEREFORE, ChargePoint respectfully requests the right to intervene, for good cause shown, as an active party in this proceeding.

Respectfully submitted,



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Attorney for ChargePoint, Inc.

Dated: July 3, 2018

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy the Petition to Intervene of ChargePoint, Inc., upon the following persons listed below in the manner indicated in accordance with the requirements of

52 Pa. Code §1.54:

Via Email and/or First Class Mail

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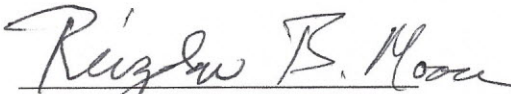
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Respectfully,

  
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