

June 2, 2021

***Via Electronic Filing***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

**RE: Docket R-2021-3024750, Pennsylvania Public Utility Commission v. Duquesne Light Company**

**Petition to Intervene of ChargePoint, Inc.**

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of ChargePoint, Inc. in the above-referenced proceeding. An electronic copy of this filing will be provided to those listed on the Certificate of Service.

Please contact me if you have any questions concerning this matter.

Respectfully submitted,

/s/ James M. Van Nostrand  
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Counsel for: ChargePoint, Inc.

CC: Deputy Chief Administrative Law Judge Joel H. Cheskis  
Chief Administrative Law Judge John M. Coogan  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light 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. In support of this Petition, ChargePoint states as follows:

1. ChargePoint is a world leading electric vehicle (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.

2. ChargePoint’s hardware offerings include Level 2 (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 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 also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

3. 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.

4. In this proceeding, Duquesne Light Company (Duquesne Light or the Company) proposes three Transportation Electrification Programs (TE Programs), which consists of two portfolios, the Charging Infrastructure Portfolio and the Customer Portfolio. The Customer Portfolio consists of Awareness, Education, and Engagement; a Fleet Electrification Advisory Service; and a Registration Incentive program.<sup>1</sup> The Charging Infrastructure Portfolio consists of three programs: a Public, Workplace, and Multi-Unit Dwelling Make-Ready Pilot (Make-Ready Pilot); a Fleet and Transit Charging Pilot; and a Home Charging Pilot.<sup>2</sup> Through the Make-Ready Pilot, Duquesne Light proposes to construct and own make-ready infrastructure to facilitate the deployment of approximately 30 Level 2 charging stations and 4 DCFCs annually.<sup>3</sup> Through the Fleet and Transit Charging Pilot, Duquesne Light proposes to construct and own make-ready infrastructure and EV

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<sup>1</sup> Duquesne Light Company Statement No. 8, Direct Testimony of Sarah J. Oleksak, p. 4.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 16.

charging stations to serve fleets, including the Port Authority of Allegheny County.<sup>4</sup> Through the Home Charging Pilot, Duquesne Light proposes to construct and own make-ready infrastructure and EV charging stations to serve residential customers.<sup>5</sup> Duquesne Light proposes to require customers in all three Charging Infrastructure Portfolio programs to share charging data with Duquesne Light.<sup>6</sup>

5. As a provider of Level 2 chargers, DCFCs, and EV charging network services in Pennsylvania, who has current and prospective customers seeking to install EV charging stations in Duquesne Light's service territory, ChargePoint has a direct and substantial pecuniary interest in Duquesne Light's proposals in this case. Specifically, Duquesne Light's proposed TE Programs will impact ChargePoint in the following ways:

- Duquesne Light's proposed Make-Ready Pilot will directly impact customers' cost of installing ChargePoint's products and services;
- ChargePoint's ability to qualify its products for Duquesne Light's proposed Charging Infrastructure programs will directly impact ChargePoint's ability to sell its products and services in Duquesne Light's service territory.
- Duquesne Light's proposal to provide its customers with EV chargers through the Fleet and Transit Charging Pilot and the Home Charging Pilot will directly impact ChargePoint's ability to sell its products and services to customers in Duquesne Light's service territory.
- Duquesne Light's proposal to provide customer education on EVs and EV charging will impact demand for ChargePoint's products and services in Duquesne Light's

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<sup>4</sup> *Id.* at 17.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 29, 39, and 49.

service territory.

For these reasons, the Commission's approval, denial, or modification of Duquesne Light's proposed TE Programs will directly impact ChargePoint's ability to sell its products and services to prospective customers in Duquesne Light's service territory.

6. ChargePoint's interests in this proceeding are specific to its business models, operations, customers, and prospective customers in Duquesne Light's service territory. ChargePoint's interests are therefore substantially different from those of any other party or potential party to the proceeding. ChargePoint has not yet determined its position on Duquesne Light's proposals. Determining whether ChargePoint opposes, supports, or supports modifications to the proposals requires further investigation, including discovery, in this proceeding.

7. 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.

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

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<sup>7</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.

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

10. No other party to this proceeding represents the interests of ChargePoint and its prospective customers in the Duquesne Light service territory.

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

/s/ James M. Van Nostrand

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Counsel for: ChargePoint, Inc.

Dated: June 2, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light Company	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties by electronic mail.

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Date: June 2, 2021

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