

June 5, 2020

Via Electronic Filing

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

RE: Docket P-2020-3019522, Petition of Duquesne Light Company for Approval of a Default Service Plan for the Period June 1, 2021 through May 31, 2025

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 Administrative Law Judge Mark A. Hower and 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

James M. Van Nostrand

Pennsylvania Bar # 327054

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Counsel for: ChargePoint, Inc.

CC: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
For Approval of a Default Service Plan : P-2020-3019522
for the Period June 1, 2021 through May 31, 2025 :

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. On April 20, 2020, Duquesne Light Company (“Duquesne” or “the Company”) filed a Petition for Approval of its Default Service Programs for the period commencing June 1, 2021 through May 31, 2025 (Petition).

2. On April 28, 2020, the Pennsylvania Public Utility Commission (“Commission”) issued a Notice of Prehearing Conference, scheduling a pre-hearing conference for 10:00 am on June 12, 2020 before Deputy Chief Administrative Law Judge Mark A. Hoyer.

3. On April 30, 2020, Judge Hoyer issued a Prehearing Conference Order requiring, in relevant part, that parties file a Petition to Intervene on or before June 5, 2020 and a Prehearing Conference Memorandum on or before June 10, 2020.

4. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72. This section provides, in relevant part, that “[a] petition to intervene may be filed by a

person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.” 52 Pa. Code § 5.72(a).

5. Section 5.72 further provides that the right or interest may be one “which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.” 52 Pa. Code. § 5.72(a)(2).

6. ChargePoint is the world’s largest and most open electric vehicle (“EV”) charging network, with over 112,000 independently owned and operated Level 2 and DC fast charging spots, including stations deployed throughout Pennsylvania and in the service territory of Duquesne.

7. 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.

8. ChargePoint has been 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.

9. ChargePoint's interests are substantially different from those of any other party to the proceeding. Specifically, Duquesne's filing includes a proposal to implement an Electric Vehicle Time of Use Pilot Program in its service territory. ChargePoint seeks to provide evidence and information in support of its own materials and Duquesne's proposed Electric Vehicle Time of Use Pilot Program in 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.

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

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11. Pursuant to 52 Pa. Code § 1.54(b)(3), Messr. Van Nostrand consents to the electronic service of all documents at the e-mail address shown above.

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

13. ChargePoint intends to actively participate in this proceeding on such matters that affect its interest and the interest of its customers in Duquesne's service territory. Such

participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by Duquesne 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

James M. Van Nostrand

Pennsylvania Bar # 327054

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Counsel for: ChargePoint, Inc.

Dated: June 5, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFICATION

I, Matthew J. Deal, Manager of Policy for ChargePoint, Inc., hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Matthew J. Deal

Date: June 5, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
For Approval of a Default Service Plan : P-2020-3019522
for the Period June 1, 2021 through May 31, 2025 :

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.

Honorable Mark A. Hoyer
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Date: June 5, 2020

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