

June 10, 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

Prehearing Conference Memorandum of ChargePoint, Inc.

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum 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

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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 :

PREHEARING CONFERENCE MEMORANDUM OF CHARGEPOINT, INC.

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Counsel to ChargePoint, Inc.

DATE: June 10, 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 :

PREHEARING CONFERENCE MEMORANDUM OF CHARGEPOINT, INC.

Pursuant to 52 Pa.Code § 5.221 - § 5.223 and the Prehearing Conference Order (“Order”) issued April 30, 2020 by Deputy Chief Administrative Law Judge Mark A. Hoyer (“Judge Hoyer” or “Presiding Judge”), ChargePoint, Inc. (“ChargePoint”) hereby submits this Prehearing Conference Memorandum.

I. Procedural Background

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.

On April 28, 2020, the 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.

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.

On June 5, 2020, ChargePoint submitted its Petition to Intervene in the proceeding.

II. Items to be Addressed at the Prehearing Conference

In accordance with 52 Pa.Code § 5.222(d) and the Order issued by Judge Hoyer, ChargePoint submits the following:

Possibility of settlement of the proceeding (§ 5.222(c)(1):

ChargePoint is not in a position to comment on prospects for settlement of the proceeding.

Whether the matter should be decided upon legal briefs, or whether a hearing is necessary (Prehearing Conference Order, p. 4):

A hearing appears to be necessary.

Amount of hearing time required, schedule of hearing dates (§ 5.222(c)(2):

The procedural schedule preliminarily agreed upon by the parties contemplates one day of hearings, scheduled for September 9, 2020.

Arrangements for the submission of direct testimony, written requests for information (§ 5.222(c)(3):

To be discussed at the Prehearing Conference.

Proposed plan and schedule of discovery (§ 5.222(c)(4)(iv):

The Company has communicated its intention to request that Judge Hoyer adopt modified discovery rules, to which ChargePoint does not object.

Presently identified issues (§ 5.222(d)(1)(i):

ChargePoint has identified the Company's proposal to implement an Electric Vehicle Time of Use ("EV-TOU") Pilot Program in its service territory (Petition, pp. 15-16) as an issue in which ChargePoint has an interest.

Names and addresses of the witnesses (§ 5.222(d)(1)(ii):

ChargePoint has not yet determined whether it will offer a witness with respect to the Company's proposed EV-TOU Pilot Program, and respectfully reserves the right to present a witness if the need arises.

Proposed area of testimony of each witness (§ 5.222(d)(1)(iii):

Any witness offered by ChargePoint would present testimony regarding the Company's proposed EV-TOU Pilot Program.

Development of a proposed procedural schedule (§ 5.222(d)(2)(i):

The Company proposed the following procedural schedule which, with one modification, appears to have been preliminarily agreed upon by the parties (including ChargePoint):

Date	Action
July 17, 2020	Non-Company Parties' Direct Testimony
August 14, 2020	Rebuttal Testimony
August 28, 2020	Surrebuttal Testimony
September 4, 2020	Rejoinder Outlines
September 9, 2020	Evidentiary Hearing
September 30, 2020	Main Briefs
October 13, 2020	Reply Briefs

Telephonic participation in prehearing conference (Prehearing Conference Order, p. 5):

ChargePoint hereby designates James M. Van Nostrand as lead representative for the Prehearing Conference; Mr. Van Nostrand will be participating by telephone.

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III. Conclusion

ChargePoint appreciates the opportunity to submit this Prehearing Conference Memorandum and looks forward to further discussion of the issues presented herein at the Prehearing Conference.

Respectfully submitted this 10th day of June 2020.

/s/ James M. Van Nostrand
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**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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Witness for OSBA

Date: June 10, 2020

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