

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 19-057

Public Service Company of New Hampshire d/b/a Eversource Energy

Petition for Permanent Increase to Distribution Rates

PETITION FOR INTERVENTION OF CHARGEPOINT, INC.

ChargePoint, Inc. (“ChargePoint”) respectfully petitions for intervention in the above-captioned proceeding, pursuant to the June 7, 2019 Order Suspending Tariff and Scheduling Prehearing Conference, Order No. 26,356 (“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 a permanent rate increase of Eversource Energy (“Eversource”) pending further investigation. In its Order, the Commission directed interested parties to seek intervention by June 18, 2019. ChargePoint recently learned that its interests are at issue in this proceeding, and therefore respectfully seeks leave for late intervention.

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.”¹ 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 and orderly and prompt conduct. ChargePoint therefore respectfully requests that the Commission grant this petition.

The Commission’s Order states that the purpose of this docket is to examine Eversource’s request for a general rate increase, amounting to a revenue requirement increase of \$69.9 million, as well as Eversource’s request for approval for a number of related proposals.² Among the activities that Eversource addresses in this rate proposal is a transportation electrification program. ChargePoint’s interests are focused on this program. Specifically, Eversource states that it is:³

exploring options for a public-private partnership to develop an electric vehicle (“EV”) fast charging corridor for New Hampshire, in coordination with the state EV Commission. Through this project, PSNH would invest approximately \$2 million of base capital to construct distribution facilities, primarily service drops, to energize a series of EV fast chargers.... The chargers would be owned by third-party charging vendors that are selected through a competitive bid process. This project would support customer deployment of up to 48 50kW DC fast-charging stations at approximately 12 sites throughout the Company’s service territory, with the infrastructure to support future expansion of up to 40 additional DC fast chargers.

As a provider of Level 2 chargers, DC fast chargers (“DCFCs”), and EV charging network services in New Hampshire who has existing customers as well as prospective customers seeking to install EV charging stations in Eversource’s service territory, ChargePoint has a direct and substantial interest in Eversource’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. Eversource’s proposal to invest in

¹ RSA 541-A:32 authorizes the presiding officer to “grant one or more petitions for intervention at any time” if the qualifications for intervention are met.

² Order at 1.

³ Testimony of William J. Quinlan, at 35, Docket No. DE 19-057 (May 28, 2019).

make-ready infrastructure will therefore directly impact ChargePoint's ability to sell its products and services to prospective customers in Eversource's service territory. The outcome of this proceeding will thus substantially affect ChargePoint's pecuniary and tangible interests. As such, ChargePoint's rights, duties, privileges, or other substantial interests will be directly affected by this proceeding. RSA 541-A:32(b).

ChargePoint is the world's largest electric vehicle ("EV") charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 105,000 independently owned charging spots, ChargePoint drivers have completed more than 69 million charging sessions, saving upwards of 83 million gallons of gasoline and driving more than 1.9 billion gas-free miles.

ChargePoint designs, manufactures, and deploys residential and commercial AC Level 2 and DCFC electric vehicle charging stations, cloud-based software applications, data analytics, and related customer and driver services aimed at creating a robust, scalable, and grid-friendly EV charging ecosystem. ChargePoint sells EV charging equipment and network services to a wide variety of customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, and multi-unit dwelling owners. ChargePoint offers a broad array of products and services that can serve light, medium, or heavy-duty electric vehicles.

In New Hampshire, ChargePoint has supported the deployment of hundreds of EV charging stations throughout the state. In addition to its commercial activities, ChargePoint has contributed comments to the Commission's investigation in Docket IR 15-510, Investigation into Resale of Electricity by Electric Vehicle Charging Stations and has provided presentations and technical assistance to the Electric Vehicle Charging Stations Infrastructure Commission ("EV

Commission”) as established by Senate Bill 517 of 2018. Kevin Miller, Director of Public Policy for ChargePoint, serves as a member of the EV Commission.

Through its communications with Clean Energy New Hampshire (“Clean Energy NH”), an intervenor in this proceeding, ChargePoint recently became aware that Eversource has proposed an electric vehicle infrastructure program in this docket that implicates ChargePoint’s interests. ChargePoint intends to file joint testimony together with Clean Energy NH in this proceeding on December 20, 2019. In order to adequately protect its interests, ChargePoint also hereby seeks full intervenor status separate from Clean Energy NH. ChargePoint’s interests are not fully addressed by the intervention of other parties in this proceeding, in part because ChargePoint’s interests in this docket are more narrowly focused on transportation electrification, whereas other parties may have additional unrelated interests. Furthermore, the depth of expertise that ChargePoint can offer in the area of electric vehicle infrastructure and related policy issues is unmatched by other parties in this proceeding, and therefore can be valuable to the Commission in the Commission’s careful deliberations of the rate proposal before it. Having both a unique interest and special expertise to offer, ChargePoint’s late intervention is warranted and will be beneficial. ChargePoint’s participation will focus on the subject of electric vehicle transportation infrastructure and related policies and practices including rate structures and demand charges.

ChargePoint accepts the procedural schedule and all other procedural decisions that have been approved in this docket. ChargePoint is intervening before the deadline for intervenor testimony, and consents to discovery during the designated timeframe even if the Commission has not yet issued a decision on this petition.⁴ For these reasons, ChargePoint’s intervention will

⁴ In any event, the discovery period extends through January 17, 2020.

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 19-057.

Respectfully submitted,



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Dated December 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petition has, on this 17th day of December 2019, been sent by email to the service list in Docket No. DE 17-136.



Melissa E. Birchard