

**STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION**

Docket No. DE 21-078

Eversource Energy

Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals

PETITION TO INTERVENE OF CHARGEPOINT, INC.

Pursuant to the Order issued on August 10, 2021, by the New Hampshire Public Utilities Commission (the Commission) in the above-captioned docket, N.H. Admin. Rules Puc 203.17, and in accordance with the standards set forth at RSA 541-A:32, ChargePoint, Inc. (ChargePoint) respectfully 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. 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 when a petitioner demonstrates that it has "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." As described below, ChargePoint has substantial interests that will be affected by the outcome of this proceeding. ChargePoint therefore respectfully requests that the Commission grant this petition to intervene.

5. In its Petition for Electric Vehicle Make-Ready and Demand Charge Alternative Proposals (Eversource Petition), Eversource proposes to invest in make-ready infrastructure to support DC fast charging (DCFC) sites that are chosen through the New Hampshire Volkswagen

Environmental Mitigation Trust (NH Trust) Request for Proposal (RFP) process.¹ Specifically, Eversource states that it “proposes to provide new service connections for each new charging service location as well as the requisite new infrastructure in front of and behind the meter.”² Eversource also proposes a “Demand Charge Alternative” intended to mitigate the impact of the demand charges in Eversources Rate GV for public EV charging stations.³

6. As a provider of Level 2 chargers, DC fast chargers, and EV charging network services in New Hampshire with existing customers as well as prospective customers seeking to install and operate EV charging stations in the state, ChargePoint’s business interests will be substantially affected by Eversource’s proposals in this proceeding, including both the proposed make-ready investments and the proposed Demand Charge Alternative. Specifically, the Commission’s approval, denial, or modification of Eversource’s proposed make-ready investments will directly impact the cost and value proposition for purchasing EVs and installing EV charging stations for customers in Eversource’s service territory, including ChargePoint’s products and services. As a provider of EV charging equipment and network services, ChargePoint’s ability to qualify its equipment for participation in the make-ready investment proposal will directly affect ChargePoint’s ability to sell its products and services in Eversource’s service territory. Further, the Commission’s approval, denial, or modification of Eversource’s proposed Demand Charge Alternative will directly impact the cost of operating DC fast chargers, which in turn directly impacts the value proposition for ChargePoint’s existing customers and prospective customers considering investing in DC fast chargers in Eversource’s service territory. ChargePoint’s substantial pecuniary interests will be directly affected by the outcome of this proceeding.

¹ Eversource Petition, ¶ 3.

² *Id.*

³ *Id.* at 6.

7. ChargePoint has participated in numerous utility regulatory proceedings across the country involving issues of utility transportation electrification programs and rate design. If granted party status, ChargePoint will bring this experience and expertise to bear in this proceeding to aid the Commission in its decisionmaking. ChargePoint was granted intervention in Docket No. DE 20-170 and is actively participating in that proceeding. ChargePoint also provided several sets of comments and participated productively in Docket No. IR 20-004, *Investigation into Rate Design Standards for Electric Vehicle Charging Stations and Electric Vehicle Time of Day Rates*, and looks forward to continuing to provide stakeholder input and industry expertise on related EV rate design issues in this proceeding. ChargePoint also recently provided oral and written testimony on EV issues in Docket No. DE 19-057, Eversource Energy's electric rate case. ChargePoint's participation is in the public interest and will not impair the orderly and prompt conduct of the proceedings.

WHEREFORE, ChargePoint, Inc. respectfully requests that the Commission grant its petition to intervene in Docket No. DE 21-078. Pursuant to N.H. Admin. Rules Puc 203.16, ChargePoint will be represented by the undersigned Scott Dunbar of the law firm Keyes & Fox, LLP. Mr. Dunbar is an attorney in good standing in Colorado, with Colorado Bar No. 44521.

Respectfully submitted on August 20, 2021,

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