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Renardo L. Hicks
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May 17, 2018

Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

Re: Pa. PUC v. Duquesne Light Co. Docket No. R-2018-3000124

Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of ChargePoint, Inc. in the above-referenced proceeding. This document was served on all parties of record as shown on the attached Certificates of Service and filed electronically with the Commission on this date.

Very truly yours,

A handwritten signature in cursive script that reads 'Renardo L. Hicks'.

Renardo L. Hicks, Esquire

cc: Enclosure
Hon. Katrina L. Dunderdale, ALJ
All parties of record

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

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R-2018-3000124

v.

Duquesne Light Company

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**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, out of time, for good cause shown. In support of this Petition, ChargePoint states as follows:

1. On March 28, 2018, Duquesne Light Company ("Duquesne") filed a request for a base rate increase of approximately \$133.8 million. Net of changes in surcharges, the resulting increase would be approximately \$81.6 million.

2. ChargePoint is the world's largest and most open electric vehicle ("EV") charging network, with nearly 49,000 independently owned and operated Level 2 and DC fast charging spots, including stations deployed throughout Pennsylvania and in the service territory of Duquesne.

3. 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.

4. ChargePoint has been an active participant in the Pennsylvania Public Utility Commission's ("Commission's") Third Party Electric Vehicle Charging - Resale/Distribution proceedings at 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..

5. ChargePoint's interests are substantially different than those of any other party to the proceeding. Specifically, Duquesne's filing includes a proposal to implement an EV ChargeUp Pilot program in their service territory. Moreover, in Duquesne's Statement No. 6, the Direct Testimony of Joseph G. Dematteo, included therein as Exhibit JD – 3, "Driver's Checklist: A Quick Guide to Fast Charging" is a document published and created by ChargePoint. ChargePoint seeks to provide evidence and information in support of its own materials and Duquesne's proposed EV Pilot program in this proceeding.

6. In its efforts to comply with PA PUC Rule 1.22, until recently, ChargePoint was unable to secure Pennsylvania legal counsel, without conflicts, to represent ChargePoint in these proceeding. As a result, ChargePoint was unable to formally participate in the May 3, 2018 initial telephonic prehearing conference in this matter. However, ChargePoint has since secured local counsel and intervention by ChargePoint will not cause confusion or delay the conclusion of 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 than those of any other party to the proceeding. Moreover, ChargePoint will not seek to delay the proceeding in any manner and hereby agrees to accept any agreements reached by the parties thus far, and any order or rulings with respect thereto.

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

Renardo L. Hicks (PA Atty. Id. No. 40404)
Dilworth Paxson LLP
Penn National Insurance Building
2 North 2nd Street, Suite 1101
Harrisburg, PA 17101
Voice: 717-236-4812
Email: rhicks@dilworthlaw.com

8. All documents and notices in this proceeding should be served on the above counsel. Further, pursuant to 52 Pa. Code § 1.54(b)(3), Mr. Hicks consents to the electronic service of all documents at the e-mail address shown above.

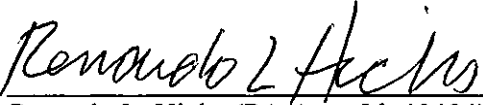
9. No other party to this proceeding represents the interests of ChargePoint and its customers in the Duquesne service territory.

10. ChargePoint intends to actively participate in this proceeding on such matters that affect its interest and the interest of its customers in Duquesne 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.

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Respectfully submitted,


Renardo L. Hicks (PA Atty. Id. 40404)
Dilworth Paxson LLP
Penn National Insurance Building

2 North 2nd Street, Suite 1101
Harrisburg, PA 17101
Voice: 717-236-4812
Email: rhicks@dilworthlaw.com
Counsel for: ChargePoint, Inc.

Dated: May 17, 2018


**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2018-3000124
	:	
v.	:	
	:	
Duquesne Light Company	:	

VERIFICATION

I, Kevin George Miller, Director 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).

Date: May 17, 2018



Kevin George Miller

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	R-2018-3000124
	:	
v.	:	
	:	
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 (where an email address is shown) and first class mail.

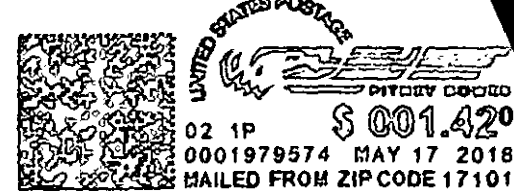
<p>The Honorable Katrina L. Dunderdale Administrative Law Judge Pennsylvania Public Utility Commission Piatt Place Suite 220 301 5th Avenue Pittsburgh, PA 15222 kdunderdale@pa.gov</p>	<p>Gina L. Miller, Esq. John M. Coogen, Esq. Bureau of Investigation & Enforcement Pa. Public Utility Commission 400 North Street Harrisburg, PA 17120 ginmiller@pa.gov jcoogen@pa.gov</p> <hr/> <p>William H. Roberts, II, Esq. PNG Companies, LLC 375 North Shore Drive Pittsburgh, PA 15212 William.h.robertsii@peoples-gas.com Counsel for People’s Natural Gas Company, LLC</p>
<p>Patrick M. Cicero, Esq. Kadeem G. Morris, Esq. Elizabeth R. Marx, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net</p>	<p>David P. Zambito, Esq. Jonathan P. Nase, Esq. Cozen O’Connor 17 North 2nd Street, 14th Floor Harrisburg, PA 17101 Counsel for People’s Natural Gas Company, LLC dzambito@cozen.com</p>

<p>Jason Dolby 409 Anawanda Avenue Pittsburgh, PA 15228</p>	<p>Michael W. Gang, Esq. Anthony D. Kanagy, Esq. Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101 mgang@postschell.com akanagy@postschell.com Counsel for Duquesne</p>
<p>Phillip D. Demanchick, Esq. David T. Evrad, Esq. Aron J. Beatty, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923 PDemanchick@paoca.org</p>	<p>Joseph L. Vullo, Esq. Burke Vullo Reilly Roberts 1460 Wyoming Ave Forty Fort, PA 18704 Counsel for Community Action Association of PA(CAAP) jlullo@aol.com</p>
<p>Scott J. Rubin, Esq. Public Utility Consulting 333 Oak Lane Bloomsburg, PA 17815 Counsel for International Brotherhood of Electrical Workers, Local 29 SCOTT.J.RUBIN@GMAIL.COM</p>	<p>Daniel G. Asmus, Esq. Sharon Webb, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 dasmus@pa.gov swebb@pa.gov</p>

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Renardo L. Hicks



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Rosemary Chavetta, Secretary
Pa. Public Utility Commission
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