

March 4, 2021

Via Electronic Filing

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

RE: Docket R-2021-3023618, UGI Utilities, Inc. – Electric Division Supplement No. 26 to UGI Electric Tariff – PA PUC No. 6 and Supplement No. 2 to UGI Electric Tariff – Pa. PUC No. 2S

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 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**

UGI Utilities, Inc. – Electric Division	:	R-2021-3023618
Supplement No. 26 to UGI Electric Tariff -	:	
Pa. PUC No. 6 and Supplement No. 2 to UGI	:	
Electric Tariff – Pa. PUC No. 2S	:	

**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. ChargePoint is one of the world’s largest electric vehicle (EV) charging networks, with scalable solutions for charging at home, work, around town, and on the road. With customers that include workplaces, cities, retailers, apartments, utilities, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data.

2. ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. 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 and 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 site hosts to manage charging onsite with features like Waitlist,

access control, charging analytics, and real-time availability. ChargePoint products are UL-listed, ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

3. ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and 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. In this proceeding, UGI Utilities, Inc. – Electric Division (UGI Electric) proposes to develop, own, and operate three DCFC EV charging stations (potentially adding Level 2 chargers at the same site) and to revise its service extension regulations to invest, own, and maintain make-ready infrastructure needed to serve customer-owned EV charging stations.¹ UGI Electric also proposes to provide customer education regarding EVs and EV charging.²

5. As a provider of Level 2 chargers, DCFCs, and EV charging network services in Pennsylvania, who has prospective customers seeking to install EV charging stations in UGI Electric's service territory, ChargePoint has a direct and substantial pecuniary interest in UGI

¹ UGI Electric Statement No. 6, Direct Testimony of John D. Taylor, pp. 38-40.

² *Id.* at 41.

Electric's proposals in this case. Specifically, UGI Electric's EV Program proposal will impact ChargePoint in the following ways:

- UGI Electric's proposal to own make-ready infrastructure will directly impact the cost of installing ChargePoint's products and services.
- ChargePoint's ability to qualify its products for UGI Electric's proposed make-ready provisions will directly impact ChargePoint's ability to sell its products and services in UGI Electric's service territory.
- UGI Electric's proposal to own and operate three DCFCs, as well as potentially owning Level 2 chargers at the same sites, will directly impact demand for ChargePoint's products and services in UGI Electric's service territory.
- UGI Electric's proposal to provide customer education on EVs and EV charging will impact demand for ChargePoint's products and services in UGI Electric's service territory.

For these reasons, the Commission's approval, denial, or modification of UGI Electric's EV Programs will directly impact ChargePoint's ability to sell its products and services to prospective customers in UGI Electric's service territory

6. ChargePoint's interests in this proceeding are specific to its business models, operations, customers, and prospective customers in UGI Electric's service territory. ChargePoint's interests are therefore substantially different from those of any other party or potential party to the proceeding. ChargePoint has not yet determined its position on UGI Electric's proposals. Determining whether ChargePoint opposes, supports, or supports modifications to the proposals requires further investigation, including discovery, in this proceeding.

7. 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. Moreover, ChargePoint will not seek to delay the proceeding in any manner.

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

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9. Pursuant to 52 Pa. Code § 1.54(b)(3), Messrs. Van Nostrand and Dunbar consent to the electronic service of all documents at the e-mail address shown above.

10. No other party to this proceeding represents the interests of ChargePoint and its prospective customers in the UGI Electric service territory.

11. ChargePoint intends to actively participate in this proceeding on such matters that affect its interest and the interest of its prospective customers in UGI Electric's service territory. Such participation may include the presentation of direct or rebuttal testimony and the cross-examination of witnesses presented by UGI Electric and other parties to this proceeding.

³ Mr. Dunbar is an attorney licensed to practice law in the State of Colorado. Simultaneous with this Petition to Intervene, ChargePoint is filing a Motion for Admission Pro Hac Vice for Mr. Dunbar accompanied by the required statements and verifications.

WHEREFORE, ChargePoint respectfully requests the right to intervene, for good cause shown, as an active party in this proceeding.

Respectfully submitted,

/s/ James Van Nostrand
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Counsel for: ChargePoint, Inc.

Dated: March 4, 2021


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VERIFICATION

I, Matthew Deal, Public Policy Manager – Regulatory 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: March 4, 2021


Matthew Deal

**BEFORE THE
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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.

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Date: March 4, 2021

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