

March 18, 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, Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Electric Division

Prehearing Memorandum of ChargePoint, Inc.

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum 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/ Scott F. Dunbar

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Counsel for: ChargePoint, Inc.

CC: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3023618
	:	
UGI Utilities, Inc. – Electric Division	:	

**PREHEARING MEMORANDUM
OF CHARGEPOINT INC.**

Pursuant to the Administrative Law Judge’s Prehearing Conference Order issued on March 10, 2021, ChargePoint, Inc. (ChargePoint) respectfully files this Prehearing Memorandum.

I. Background on ChargePoint.

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.

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.

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.

II. Proposed Litigation Schedule.

ChargePoint has worked with the other parties and expects that an agreed-upon schedule will be presented to the Administrative Law Judge at the time of the conference.

III. Issues

ChargePoint intends to address the following issues in this proceeding:

1. UGI Utilities, Inc. – Electric Division's (UGI Electric) proposal to develop, own, and operate three DCFC EV charging stations (potentially adding Level 2 chargers at the same site)

2. UGI Electric’s proposal to revise its service extension regulations to invest, own, and maintain make-ready infrastructure needed to serve customer-owned EV charging stations.¹
3. UGI Electric’s proposal to provide customer education regarding EVs and EV charging.²
4. Any additional issues that may arise during the discovery process.

Through this proceeding, ChargePoint intends to recommend programmatic changes to one or more the UGI Electric proposals described above.

IV. Witnesses

ChargePoint may call the following witnesses to testify on its behalf regarding the issues listed above:

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V. Settlement

ChargePoint will engage in settlement discussions as this matter proceeds.

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

² *Id.* at 41.

Respectfully submitted,

/s/ Scott F. Dunbar

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Counsel for: ChargePoint, Inc.

Dated: March 18, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3023618
	:	
UGI Utilities, Inc. – Electric Division	:	

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 18, 2021

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