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January 29, 2018

**VIA ELECTRONIC FILING AND FIRST CLASS U.S. MAIL**

Ms. Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket No. 4770**

Dear Ms. Massaro

Enclosed for filing in the above-referenced docket, please find one original and nine copies of the following documents: (1) Motion to Intervene of ChargePoint Inc., and (2) Appearance of Counsel. Please contact me should you have any questions regarding this filing. Thank you for your attention to this matter.

Sincerely,

**BROWN RUDNICK LLP**



Edward D. Pare

Encl.

cc: Docket No. 4770 service list (*via electronic mail*)  
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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

\_\_\_\_\_  
In re: The Narragansett Electric Company d/b/a )  
National Grid’s Proposed Power Sector Transformation )  
Vision and Implementation Plan )  
\_\_\_\_\_ )

Docket No. 4770

**MOTION TO INTERVENE  
OF CHARGEPOINT, INC.**

Pursuant to Section 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (“PUC” or “Commission”) and the Procedural Schedule issued on December 21, 2017, in the above-captioned docket, ChargePoint, Inc. (“ChargePoint”) hereby moves for leave to intervene in this proceeding. As grounds for this motion, ChargePoint states:

1. ChargePoint is a corporation organized under the laws of the State of Delaware, with a principal office at 254 East Hacienda Avenue, Campbell, California 95008.
2. ChargePoint is the world’s largest and most open electric vehicle (“EV”) charging network with nearly 44,000 level 2 and DC fast charging spots, including more than 190 in Rhode Island. By delivering more than 31 million EV charging sessions, ChargePoint drivers have driven over 745 million electric miles and avoided over 31 million gallons of gas and 104 million kgs of GHG emissions.
3. Nationwide, ChargePoint has over 7,000 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 our network are primarily owned and operated by these EV charging station site hosts, which provide EV charging services.

## **Background**

4. On November 27, 2017, The Narragansett Electric Company d/b/a National Grid (“National Grid” or “the Company”) filed a petition with the PUC requesting an increase in electric and gas base distribution rates and proposing a suite of programs under its Power Sector Transformation Vision and Implementation Plan (“PST Plan”). The PUC bifurcated the original docket, No. 4770, and commenced a separate proceeding to review the PST Plan in docket No. 4780.
5. The PST Plan includes, among other things, an Electric Transportation Initiative consisting of (a) a Charging Station Demonstration Program, (b) a Residential Off-Peak Charging Rebate, (c) a rate discount for DC Fast Charging Station Accounts, (d) a Transportation Education and Outreach plan; (e) investment in electrification of the Company’s own vehicle fleet; and (f) an evaluation plan.

## **Standard of Review**

6. Pursuant to Section 1.13(b) of the PUC Rules of Practice and Procedure, the Commission may permit intervention by “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate . . . .”
7. Such an interest may include one “which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding.” PUC Rule 1.13(b)(2).
8. Such an interest may also include any “interest of such nature that movant’s participation may be in the public interest.” PUC Rule 1.13(b)(3).

## Argument

9. ChargePoint has a substantial and direct economic interest in the sustainable and scalable growth of the Rhode Island EV and EV charging markets. A fully realized EV Program implemented by National Grid will support growth in those markets. As a provider of EV charging equipment and EV network services to consumers, ChargePoint's interests are unique, and no other party can adequately represent those interests.
10. Rhode Island is a signatory of the Zero Emission Vehicle ("ZEV") Program Memorandum of Understanding (October 24, 2013), *available at* <http://www.nescaum.org/documents/zev-mou-8-governors-signed-20131024.pdf>. Thus, the state has committed, as a matter of public policy, to spur the growth of the ZEV market in Rhode Island, including planning the infrastructure necessary to support that market. *See* State of Rhode Island Zero Emission Vehicle Action Plan (2016), *available at* <http://www.energy.ri.gov/documents/Transportation/Rhode%20Island%20ZEV%20Action%20Plan%20Final%202016.pdf>.
11. In addition, the Division of Public Utilities and Carriers ("DPUC"), the Office of Energy Resources ("OER"), and PUC have recognized that beneficial electrification of the transportation sector would help to ensure achievement of the state's "collective policy goals of controlling long-term system costs, enhancing customer choice, unleashing third-party innovation and integrating more clean energy into our electric grid." *See* Rhode Island Power Sector Transformation, Phase One Report to Governor Gina M. Raimondo (November 2017), *available at*

[http://www.ripuc.org/utilityinfo/electric/PST%20Report\\_Nov\\_8.pdf](http://www.ripuc.org/utilityinfo/electric/PST%20Report_Nov_8.pdf) (“PST Phase One Report”).

12. ChargePoint has been an active participant in the Rhode Island ZEV Working Group. ChargePoint also provided comments to help shape the PST Phase One Report by DPUC, OER, and the PUC. Thus, ChargePoint has been actively involved in the formulation of Rhode Island’s ZEV public policies.
13. Although the proceedings have been bifurcated, certain issues pertaining to the Electric Transportation Initiative may still be addressed in Docket No. 4770. Thus, the PUC should find that ChargePoint’s participation in this proceeding is appropriate and in the public interest.
14. ChargePoint has actively participated in recent and on-going public utility commission review of EV charging infrastructure programs in California (Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric), Indiana (Northern Indiana Public Service Company), Kansas and Missouri (Kansas City Power and Light), Kentucky (Kentucky Utilities & Louisville Gas & Electric), Massachusetts (Eversource and National Grid), Michigan (Consumers Energy), Minnesota (Xcel Energy), Nevada (NV Energy), Texas (Austin Energy and CPS Energy), Washington (Puget Sound Energy), Oregon (all utilities) and Wisconsin (Madison Gas & Electric).
15. ChargePoint can also provide testimony and supporting evidence that will not otherwise be available in this docket and which will be necessary for the PUC to fully evaluate the Company’s proposed Electric Transportation Initiative. The breadth of ChargePoint’s market and EV charging policy expertise would assist the PUC in evaluating the most efficient and effective approaches to achieve sustainable and scalable growth in Rhode

Island's EV and EV charging infrastructure markets. Thus, the PUC should find that ChargePoint's expertise and interest is of a nature that its participation is necessary to this docket.

### **Communications**

16. ChargePoint requests electronic service of all notices, testimony, pleadings, and correspondences pertaining to this proceeding to the following persons identified below:

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WHEREFORE, for all of the foregoing reasons, ChargePoint respectfully requests that the Commission grant its Motion to Intervene.

Respectfully submitted

CHARGEPOINT, INC.

By its attorney,

  
Edward D. Pare, Jr. (#5812) *JSR*  
Brown Rudnick LLP  
10 Memorial Boulevard  
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Dated: January 29, 2018

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

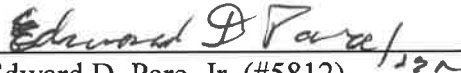
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\_\_\_\_\_)

Docket No. 4770

**NOTICE OF APPEARANCE OF COUNSEL**

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission, please enter my appearance on behalf of ChargePoint, Inc.


Respectfully submitted

  
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Brown Rudnick LLP  
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Tel: (401) 276-2639  
Email: [epare@brownrudnick.com](mailto:epare@brownrudnick.com)

Dated: January 29, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of January, 2018, the original and nine (9) copies were mailed by first class United States mail to the Clerk of the Rhode Island Public Utilities Commission. In addition, electronic copies of the foregoing documents were served via email to the service list in this docket.

  
Edward D. Pare, Jr.