

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Approval of a Tariff Setting a Rate for)
Electric Vehicle Charging Stations.) Case No. ET-2016-0246

APPLICATION TO INTERVENE

ChargePoint, Inc. ("ChargePoint") hereby files this Application to Intervene with the Public Service Commission of the State of Missouri ("Commission") to intervene in the above captioned case pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure.¹ In support of this Application, ChargePoint states as follows:

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. ChargePoint is the world's largest and most open electric vehicle ("EV") charging network with 30,000 level 2 and DC fast charging ports. Nationwide, ChargePoint has over 5,500 customers, including major employers, municipalities, universities, real estate developers, energy companies, and parking garage facility owners and operators providing EV charging and related services to EV drivers.

2. Correspondence, communications, orders and the decisions in this matter should be addressed to:

Anne Smart
Director, Government Relations and Regulatory Affairs
254 E. Hacienda Ave
Campbell, CA 95008
Telephone No: 408-841-4522

¹The comments expressed in this filing represent the position of ChargePoint as an organization, but may not represent the views of any particular customer of ChargePoint.

Mark W. Comley
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone No.: 573-634-2266
Fax No.: 573-636-3306

3. ChargePoint has a significant presence in Missouri with 954 independently-owned public and private ports in Missouri. Ameren is a customer of ChargePoint and has purchased and installed ChargePoint stations at its headquarters for workplace charging. Kansas City Power & Light Company is also a customer of ChargePoint and the public EV charging infrastructure installed under its Clean Charge Network is on the ChargePoint network.

4. On November 20, 2015, the Commission opened EW-2016-0123 to investigate issues related to the regulation of EV charging facilities in Missouri. The Commission requested comments on a series of questions related to the regulation of public charging and the role of utilities in deploying EV charging infrastructure in Missouri and precedent from other states. ChargePoint provided written comments, submitted data on our public charging stations, and participated in the May 25, 2016 workshop. Commission staff issued a report on August 5, 2016 (corrected on August 9, 2016) with recommendations on cost recovery and data collection for utility EV charging pilots.

5. On August 15, 2016, Ameren filed an application for approval of a tariff setting a rate for EV charging stations. Ameren is seeking the ability to own and operate EV charging stations at 6 “charging islands” for public use. Ameren is also proposing to set the pricing to drivers for the charging service at these sites. Ameren has also issued an RFP to purchase charging equipment for these sites.

6. ChargePoint seeks to intervene in this case and provide its expertise to the Commission to ensure that Ameren Missouri is supporting positive EV driver behavior through

appropriate pricing policies, enabling competition and customer choice in the EV charging market, and allowing ratepayers, the State, and the utility to realize the grid benefits and societal benefits identified in Ameren's application. At this time ChargePoint is uncertain of the position it will take in this matter.

7. ChargePoint intends to participate in these proceedings to the extent necessary to address the issues as set forth herein, and specifically to ensure the program proposed by Ameren supports the roles played by EV charging station site hosts and network service providers. These interests of ChargePoint in this proceeding cannot be adequately represented or protected by any other party. ChargePoint's interest in this proceeding is different from that of the general public.

8. ChargePoint has a substantial and specific economic interest in the sustainable and scalable growth of EV charging infrastructure in Missouri, and whether actions taken by the Commission in this case will promote, rather than hinder, a competitive EV charging market and EV adoption in the near and long term. ChargePoint's first-hand market experience, along with knowledge of policy and regulatory implementation in other states, would be a valuable asset in assisting the Commission in determining how best to achieve scalable, sustainable EV growth in Missouri.

8. The breadth of ChargePoint's market expertise would be an asset for the Commission in evaluating the most efficient and effective approaches to achieve scalable and sustainable growth in EV and EV charging infrastructure markets in Missouri. For instance, in addition to participating in KCP&L's utility-based EV charging infrastructure programs in Kansas and Missouri, ChargePoint is actively participating in pending and current utility-based EV charging infrastructure programs in Indiana (Northern Indiana Public Service Commission), Kentucky (Kentucky Utilities and Louisville Gas & Electric), Nevada (NV Energy), Texas (Austin Energy and CPS Energy),

Washington (Puget Sound Energy), and Wisconsin (Madison Gas & Electric). ChargePoint has also actively participated in the major proceedings and policy initiatives targeting advancement of EV adoption across the country.² Throughout these policy proceedings, ChargePoint has consistently emphasized the potential of integrating EVs and the grid and advocated for the adoption of policies supporting and enabling smart charging, which may enable EV drivers to participate in grid operations and thus offset initial costs of EV adoption. In addition, ChargePoint has promoted product and technology advancements to facilitate effective load management so that EV adoption can benefit all ratepayers, help integrate more renewable resources, and minimize impacts on the grid. ChargePoint is also a market leader in deployment of DC fast chargers and has experience in siting these stations and addressing operational challenges associated with demand charges. ChargePoint's depth of expertise in this area and experiences across widely varying markets would be an asset to the Commission in this proceeding.

WHEREFORE, for the foregoing reasons, ChargePoint respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle ChargePoint to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the argument, and in all other respects fully participate in this proceeding.

²See, e.g., comments of EVSP Coalition in Phase 1 and 2 of CPUC Rulemaking 09-08-009 (Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals); ChargePoint comments in CPUC Applications 12-11-001 through 004 (Application of the California Energy Commission for Approval of Electric Program Investment Charge Proposed 2012 through 2014 Triennial Investment Plan and related matters). ChargePoint (formerly Coulomb Technologies) has also been a member of the California Plug-In Electric Vehicle Collaborative, and active participant in development of the California ZEV Action Plan and in the California Energy Commission ("CEC") Renewable Fuel and Vehicle Technology Investment Plan process.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 31st day of August, 2016, to:

Office of Public Counsel at opcservice@ded.mo.gov;
General Counsel's Office at gencounsel@psc.mo.gov;
Russ Mitten at rmitten@brydonlaw.com; and
Wendy Tatro at AmerenMOService@ameren.com.

/s/ Mark W. Comley

Mark W. Comley