

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of The Empire District)	
Electric Company's Application for)	
Approval of a Transportation Electrification)	File No. ET-2020-0390
Portfolio for Electric Customers in its)	
Missouri Service Area)	

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

ChargePoint, Inc. (ChargePoint) respectfully submits this Application to Intervene pursuant to 20 CSR 4340-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and states as follows in support:

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. ChargePoint's network offers more than 125,000 places to charge, including more than 1,750 spots in Missouri, and those numbers continue to grow. With customers that include workplaces, cities, retailers, apartments, hospitals, utilities, 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. On the network, drivers have completed more than 86 million charging sessions, saved upwards of 105 million gallons of fuel, and driven more than 2.6 billion electric miles.

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. As a provider of EV charging equipment and network services, ChargePoint's business interests will be affected by the Commission's action with respect to the programs that Empire District Electric Company (Empire or the Company) has proposed in this case. Specifically, whether the proposed programs are approved, denied, or approved with modifications will affect

the value proposition of ChargePoint's products and services and ChargePoint's ability to provide these products and services to customers in Empire's Missouri service territory. For these reasons, ChargePoint respectfully requests that the Commission find that ChargePoint's interests may be affected by the Commission's final order in this docket and admit ChargePoint as a party with all associated party rights.

5. As a leading provider of EV charging infrastructure and network services that has participated in numerous proceedings before public service and public utility regulatory commissions around the country, ChargePoint will offer a valuable and informative perspective to the Commission through its participation in this docket. ChargePoint's participation would therefore assist the Commission in the development of a more complete record. ChargePoint has previously participated in the Commission's working docket on EV charging facilities under Case No. EW-2016-0123 and provided testimony in Case Nos. ET-2016-0246 and ET-2018-0132. No party will be adversely affected by ChargePoint's participation in this case. Granting ChargePoint's intervention is therefore in the public interest.

6. Because of ChargePoint's unique product and service offerings and its unique business model, ChargePoint's interest in this case is different from that of the general public.

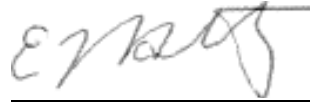
7. ChargePoint has not yet taken a position in this case.

8. ChargePoint's address is as follows: 254 E Hacienda Avenue, Campbell, CA 95108.

9. Pleadings, notices, and other correspondence in this case should be directed to the undersigned counsel.

For the foregoing reasons, ChargePoint respectfully requests the Commission grant this Application to Intervene, along with any further relief the Commission deems proper.

Respectfully submitted on December 30, 2020,



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Counsel to ChargePoint, Inc.

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 30th day of December 2020:

/s/ Blake Elder