BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Evergy Metro, Inc. d/b/a Evergy Missouri Metro's Request for Authority to Implement a General Rate Increase for Electric Service File No. ER-2022-0129

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 a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

2. ChargePoint's 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 duty, 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 EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

3. ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, 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, Evergy has proposed several programs and rates related to EV charging. Specifically, Evergy has proposed a High Differential TOU Rate and a Separately Metered EV TOU Rate for residential EV drivers, a Business EV Charging Service (BECS) pilot, and a Commercial EV Charger Rebate Program (CRP). 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 these EV charging-related programs and rates that Evergy has proposed in this case. Specifically, whether the proposed programs and rates 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 Evergy'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. ChargePoint participated as a party in Case Nos. ET-2020-0390 and ET-2021-0151. 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.¹

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

¹ Contemporaneously with this Application to Intervene, ChargePoint will be filing a Motion for Admission Pro Hac Vice for Mr. Scott Dunbar.

Respectfully submitted on February 3, 2022,

<u>/s/ Elizabeth Hubertz</u> Elizabeth Hubertz Missouri Bar No. 58403 Interdisciplinary Environmental Clinic Washington University School of Law One Brookings Drive – MSC 1120-250-258 St. Louis, MO 63130 314-935-8760 ejhubertz@wustl.edu

and

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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 on February 3, 2022:

/s/ Alicia Zaloga