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Supplemental Stakeholder Comment
Regarding a Utility's Role in Deploying Beneficial Electrification with Focus on Plug-in Electric Vehicles

Supplemental Comments of ChargePoint
October 6, 2017

I. Introduction

ChargePoint is pleased to submit these supplemental comments in response to the above-referenced Notice of Inquiry issued by the Rhode Island Public Utilities Commission, Division of Public Utilities and Carriers, and Office of Energy Resources.

ChargePoint is a leading manufacturer of electric vehicle (“EV”) charging equipment and services. Using ChargePoint products and services, customers operate more than 41,000 Level 2 and DC fast charging spots, nearly 200 of which are in Rhode Island. ChargePoint designs, develops, and deploys residential and commercial AC Level 2 (“L2”) and DC fast charging (“DCFC”) electric vehicle charging stations, software applications, data analytics, and related customer and driver services aimed at creating a robust, and grid-friendly EV charging ecosystem.

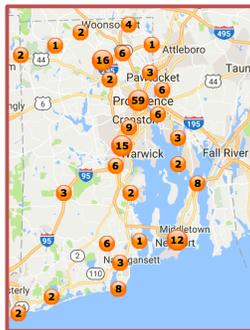


Fig. 1: ChargePoint Spots in Rhode Island

ChargePoint sells EV charging equipment and network services that enable EV charging station owners to provide charging services to their own or other EVs. In almost every case, ChargePoint does not own or operate the equipment. ChargePoint sells charging solutions to a wide variety of customers, including residential EV owners, employers, commercial and industrial businesses, cities and public agencies, ports, schools, public transit, delivery truck fleet operators, and multi-unit dwelling owners. ChargePoint offers a broad array of products and services that can serve light, medium, or heavy duty electric vehicles.

II. Supplemental Comments on Utility Program Design

There is a wide variety of investment strategies that can reduce barriers to deploying infrastructure that would support a healthy, competitive EV charging market. The simpler the program, the easier it is to go from utility commission approval to implementation. This efficiency will save ratepayer dollars and speed up the time to market for utility programs. ChargePoint identified a range of ways in which utilities can become involved in transportation electrification in our initial comments, such as residential TOU rates and demand charge reform. With regard to the



question of how utilities can become involved in deploying infrastructure and equipment, we respectfully urge the Commission to focus on two utility program options: rebates for infrastructure and the “make ready” model.

Rebates offered for a set percentage of project costs are simple, efficient, and minimize impact to the competitive EV charging market. The rebate would apply to a portion of either installation or equipment costs while still requiring site host “skin in the game”, or financial commitment. Exceptions to financial commitments can be made in underserved markets or environmental justice communities. Under this program design, participating EV charging site hosts receive a utility incentive to support the purchase and installation of smart EV charging infrastructure that meet core functional requirements, such as collecting data and providing the ability for load management. Rebate programs have been utilized by Puget Sound Energy, Sacramento Municipal Utility District, and Los Angeles Department of Water and Power.

Cost recovery for utility rebates can be approached in several ways. One approach would be to treat the rebate as a regulatory asset, thereby allowing a rate of return on the investment similar to other capital investments. Another approach, which has been proposed by National Grid in Massachusetts (See Massachusetts Department of Public Utilities Docket 17-13), would recover a performance-based incentive tied to achieving the program’s deployment target.

Another impactful utility program design that would focus on the installation of the electrical infrastructure on the customer side of the meter up to, but not including, the EV charging station itself. This is commonly referred to as the “make ready.” The utility would construct, own and maintain the electric infrastructure from the distribution transformer through the customer meter up to the charging station. By covering this electrical infrastructure, the utility reduces costs for customers to deploy charging stations without the need to own and operate the charging station itself. Make ready programs complement the efforts of the private market without crowding out competition. This program design has been approved in cases before the California Public Service Commission by Southern California Edison and Pacific Gas and Electric, and is also proposed by Eversource in a case pending before the Massachusetts Department of Public Utilities (See MA DPU Docket 17-05).

Under both program designs, the utility does not need to own and operate the charging stations; however, by providing incentives or covering certain costs, the utility is able to set the minimum qualification standards for the charging equipment to ensure data, load management, and other key utility needs are addressed.

III. Conclusion

Thank you for the opportunity to provide these comments. We look forward to continue supporting Rhode Island as it develops a framework for maintaining and accelerating sustainable and scalable growth in the EV and EV charging markets.

Sincerely,

/s/

Kevin George Miller
Director, Public Policy
ChargePoint, Inc.