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Questions for Discussion and Additional Stakeholder Comment
Power Sector Transformation
Initial Considerations on Utility Compensation

Comments of ChargePoint

I. Introduction

ChargePoint is pleased to submit these comments in response to the Rhode Island Public Utilities Commission (“PUC”, or “the Commission”) document issued on August 15, 2017, *Initial Considerations on Utility Compensation*.

ChargePoint is a leading manufacturer of electric vehicle (“EV”) charging equipment and services. Using ChargePoint products and services, customers operate more than 40,000 total charging spots, including over 600 DC fast charge locations, with nearly 200 spots 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, scalable, and grid-friendly EV charging ecosystem.

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.

The site host network services offered by ChargePoint enable customers to manage their charging infrastructure using cloud-based software tools. These tools provide the station owner or operator with everything needed to manage and optimize utilization of their charging stations EV charging operations, including online management tools for data analysis, billing and payment processing, load management and access control. Stations connect to ChargePoint over a secure, cellular data network (or Wi-Fi in the case of residential) allowing station owners to manage all their charging operations from a single dashboard. Maintenance and customer service are a priority for our company. ChargePoint offers a comprehensive set of support services, including: a 24/7/365 hotline for station users, parts and labor warranty, site qualification, installation and validation services, and a help line for site host specific questions.

ChargePoint stations include embedded metrology that enables separate metering of charging events and facilitation of other data collection without the need for additional utility meters. ChargePoint stations meet or exceed the requirements set forth in the electricity-as-motor-fuel sections of NIST Handbooks 44 (device code). In utility terms, our charging stations meet the accuracy requirements of ANSI C12.1-2008 (1% class) as applied to embedded EV supply equipment (“EVSE”) metering.

II. Comments

In the Commission's document issued on August 15, 2017, *Initial Considerations on Utility Compensation*, sought comment on "Innovative Partner Models", which included:

3) Electric vehicle charging stations

Electric vehicle charging stations represent an opportunity for the utility to earn revenue from a number of non-volumetric services, including:

- *subscription fee services,*
- *installation services,*
- *charging station coverage maps stemming from distribution system services*

As ChargePoint noted in comments submitted to the Commission on June 30, 2017, utilities have very important roles to play in meeting Rhode Island's transportation electrification goals. First and foremost, utilities are ideally situated to ensure that the associated new load is incorporated in a safe, reliable, and efficient manner. When considering whether to expand the role for utilities on the customer side of the meter and into the competitive market, it is important to consider Rhode Island's market today and how it is growing into tomorrow's market. As such, the identification and evaluation of opportunities for utilities to earn revenue by expanding into the competitive EV charging market should be done in the context of the overarching question of the role for regulated utilities in the competitive market.

With regard to the specific examples provided may hinge on a determination of the appropriate role of regulated utilities in the competitive EV charging market. For example:

Subscription fee services

The ability for a utility to generate revenue through subscription fee services related to EV charging hinges on ownership of equipment in order to provide this service. This can raise a number of critical issues that should be considered if the utility seeks to recover costs associated with those investments. As ChargePoint noted in our comments on June 30, 2017, ratepayer-funded investments are not inherently aligned or misaligned with statewide transportation electrification or broader power sector goals. Rather, the extent to which ratepayer-funded investments are aligned with statewide goals is driven more by the manner in which those investments are made and the ability for those investments to lead to the creation of widespread grid benefits. This is especially true if ratepayer funds are being invested in public EV charging infrastructure.

The manner in which ratepayer-funded investments are carried out also affects alignment with state goals and the extent to which ratepayer investments will help, or hold back, the competitive market. From ChargePoint's experience in deploying more than 40,000 charging spots, site hosts that make a financial contribution to the charging station are far more likely to actively support the successful installation and ongoing preventive maintenance of the charging station because they have "skin in the game." Historic and projected growth in the EV charging market show that private dollars are increasingly flowing into the market. If ratepayer funds are directed to leverage private funds, the value of a program will increase, be more sustainable, and create a larger positive impact on deployment of EV charging equipment. Requiring site host participation in selecting the right equipment and services to meet the needs of the site ensures a competitive process and will foster ongoing innovation in the market.

Before identifying and evaluating potential new revenue streams, Rhode Island would be best served by completing consideration of the role for utilities in the competitive EV charging market.



Installation services

As noted in Section 1, ChargePoint sells EV charging equipment and network services and does not conduct the installation ourselves. We would similarly urge consideration of new utility services to take place in the broader discussion of the role of utilities in EV charging to the extent that installation might be undertaken under the regulated side of the utility.

Charging station coverage maps

Maps of EV charging equipment is currently provided through the Department of Energy's Alternative Fuels Data Center. If the utility is able to provide additional visibility related to distribution capacity and where power can be sourced without significant infrastructure upgrades and costs, this could provide value to potential site hosts which are interested in adding charging stations, especially DC fast charging stations. ChargePoint would encourage the Commission to consider equitable and economical ways for Rhode Island to facilitate collaboration between utilities and third-parties to ensure that the increased load associated with growth in EV charging services be beneficial to the grid.

III. Conclusion

ChargePoint appreciates the opportunity to provide these comments. We look forward to continuing to work with the Commission and all stakeholders to develop and refine the policy and regulatory framework for transportation electrification in Rhode Island.

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Respectfully submitted,

/s/

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