## 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 Efficient Electrification	)	Case No. ET-2018-0132
Program.	)	

## **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. 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 leading open electric vehicle ("EV") charging network, with over 46,000 independently-owned and operated Level 2 and DC fast charging ports. Nationwide, ChargePoint has over 8,000 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. ChargePoint actively participates in regulatory policy engagements in jurisdictions across the country.
- 2. ChargePoint seeks to intervene in this proceeding to provide its extensive experience and expertise in programs to achieve scalable and sustainable EV charging infrastructure markets.

<sup>&</sup>lt;sup>1</sup>The 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.

ChargePoint has a substantial and specific economic interest in the growth of EV charging infrastructure in Missouri. ChargePoint's first-hand market experience, along with knowledge of policy and participation in regulatory implementation in other states, would be a valuable asset in assisting the in Commission's consideration of the Charge Ahead program.

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

David Schatz
Director, Public Policy
254 E. Hacienda Ave
Campbell, CA 95008
Telephone No: 215-858-4748

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

- 4. ChargePoint participated in the Commission's working docket on EV charging facilities under Case No. EW-2016-0123, and provided testimony on Ameren's EV pilot program, Case No. ET-2016-0246.
- 5. The 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.
- 6. ChargePoint supports utility investment in electric vehicle charging infrastructure that complements and fosters private sector deployments. At this time, ChargePoint continues to assess the position it will take 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.

Respectfully submitted,

/s/ Mark W. Comley

Mark W. Comley #28847 NEWMAN, COMLEY & RUTH P.C. 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 (573) 634-2266 (573) 636-3306 (FAX)

Attorneys for ChargePoint, Inc.

## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 14<sup>th</sup> day of March, 2018, to counsel of all parties of record.

/s/ Mark W. Comley

Mark W. Comley

## **VERIFICATION**

	)
District of Columbia	) ss.
	)

I, David Schatz, being first duly sworn, do hereby certify, depose and state that I am the Director, Public Policy for ChargePoint, Inc., which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

David Schatz

Subscribed and sworn to before me, a Notary Public, this 14th day of March, 2018.



Notary Public