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VIA ELECTRONIC FILING

July 8, 2019

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**Re: Docket No. E015/M-19-337 – *In the Matter of Minnesota Power’s Petition for Approval of its Electric Vehicle Commercial Rate Pilot.***

Dear Secretary Wolf,

Attached for electronic filing in the above-referenced matter, please find Reply Comments on behalf of ChargePoint, Inc. in response to Minnesota Power’s Petition filed on May 16, 2019. Please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink that reads "Justin Wilson". The signature is written in a cursive, flowing style.

Justin Wilson  
Director, Public Policy  
ChargePoint, Inc.

## **I. Introduction**

ChargePoint is the world's leading electric vehicle (EV) charging network with charging solutions for every charging need and in all the places EV drivers go: at home, work, around town, and on the road. With more than 65,000 independently owned charging locations, including more than 500 public and semi-public spots in Minnesota, and thousands of customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops, and manufactures hardware and software solutions across every category. ChargePoint drivers have completed 59 million charging sessions, saving upwards of 65 million gallons of gasoline and driving more than 1.5 billion gas-free miles.

ChargePoint respectfully submits the following Reply Comments in response to initial comments from Fresh Energy, Office of the Attorney General (OAG), and reply comments of Minnesota Power.

## **II. Comments**

### **a. Three Year Term**

ChargePoint remains concerned that a limited three-year pilot will not expand vehicle electrification to new customers who have yet to make capital investments due in part to the demand charge structure and how it would impact their utility bills. In our initial Comments ChargePoint suggested the pilot be expanded to five years to allow price certainty for a longer period of time and to better align with customer return on investment time frames for charging equipment. Similarly, Fresh Energy proposed that the Commission "require Minnesota Power to develop and propose a new rate structure within two years." We believe both of these alternative proposals would bring some level of price certainty to customer who could currently take advantage of this rate and potential new EV fleet and DCFC customers.

ChargePoint believes conclusion of this pilot at the end of three years with no plan or commitment to address these issues after three years does not send the correct market signals for additional customers to invest in EV charging infrastructure and could cause a price spike at the end of three years for existing customers. ChargePoint believes absent the recommendation brought in its original comments to extend the term to five years or the recommendation brought by Fresh Energy to produce a new rate structure within two years, the Commission should order the pilot structure approved in this proceeding to be in place until the Company proposes and the Commission approves a permanent alternative.

## **III. Conclusion**

ChargePoint appreciates the Company's efforts to address the impacts of demand charges on customers with EV charging equipment. We support the modified rate design and respectfully request the Commission keep the long-term view of EV charging equipment owners

in mind and ensure the rate structure continue in the absence of another alternative being approved by the Commission.

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Justin Wilson  
Director, Public Policy  
ChargePoint, Inc.