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VIA ELECTRONIC FILING

February 2, 2018

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

RE: Docket No. E002/M-17-817 Petition for Approval of a Residential EV Service Pilot Program

Dear Secretary. Wolf,

Attached for electronic filing in the above-referenced matter, please find a Statement by ChargePoint, Inc. in support of the Joint Proposal. Please let me know if you have any questions.

Sincerely,



Kevin George Miller
Director, Public Policy
ChargePoint

cc: eService List

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
PETITION FOR APPROVAL OF A RESIDENTIAL EV SERVICE PILOT PROGRAM
Docket No. E002/M-17-817
COMMENTS OF CHARGEPOINT, INC.

I. Introduction

ChargePoint is pleased to provide these comments to the Minnesota Public Utilities Commission (“PUC”, or “the Commission”) in support of the above-referenced petition by Northern States Power Company, doing business as Xcel Energy (“Xcel”, or “the Company”).

A. Background on ChargePoint

ChargePoint is the leading electric vehicle (EV) charging network in the world, with charging solutions in every category EV drivers charge, at home, work, around town and on the road. With more than 45,000 independently owned public and semi-public charging spots and more than 7,000 customers (businesses, cities, agencies and service providers), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every use case. Leading EV hardware makers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 31 million charging sessions, saving upwards of 30 million gallons of gasoline and driving more than 732 million gas-free miles.

B. Program Description

- **Scope:** Up to 100 EVSE distributed to customers who enroll within a six-month window and commit to participate in a 30-month pilot.
- **Eligibility:** Customers that live in a single-family home, own or lease an EV, do not currently participate in certain service rates, and will accept a Company-approved EVSE of their selection.
- **Ownership:** EVSE will be owned by the Company for the duration of the pilot. Under the “pre-pay” option, ownership is transferred to a customer upon conclusion of the pilot.
- **Payment Options:** Customers would have the choice of two payment options.
 - Bundled: \$27.45 monthly fee for services, which includes cost recovery for EVSE that is provided and installed by the Company.
 - Pre-pay: \$13.88 monthly fee for services, which excludes cost recovery for EVSE and installation thereof, the costs of which are contributed by customers.
- **Technological Requirements:** Qualifying EVSE must meet the following requirements:
 - Metering and billing accuracy of plus or minus 2 percent;

- Ability to retrieve 15-minute interval energy usage data;
- Secure data transfer between the customer and the Company;
- Secure onboard data storage for 15-minute interval data for minimum of 90 days;
- 10-watt standby power consumption maximum;
- Charging device must be UL Listed;
- Compatible metering data format (XML, MV90, OCPP, and CNMP);
- Certain administrative privileges that enable the Company to access charging data and to receive information from the EVSE; and
- Editing controls that prevent data tampering.

II. Comments

A. The Company’s pilot will support the reduction of barriers to adoption of EVs and facilitate enrollment in EV time of use (TOU) rates

ChargePoint supports the Company’s pilot as a means to reduce barriers to enrolling in EV TOU rates, which have been shown to incentivize EV charging to take place at times that are both cheaper for drivers and better for the grid without negatively impacting the EV driving experience.¹

Throughout the EV tariff proceedings in Docket Nos. E002/M-15-111, E017/M-15-112, and E015/M-15-120, parties such as Fresh Energy, Minnesota Center for Environmental Advocacy (“MCEA”), Institute for Local Self Reliance (“ILSR”), and ChargePoint asserted that the high cost of installing additional utility meters is a barrier for customer enrollment in EV TOU rates. The Commission has concurred, most recently ordering Minnesota Power to conduct “evaluation of options to reduce the upfront cost burden for customers looking to opt into the EV tariff, a discussion of sub-metering technologies available, and a timeline for filing a pilot program or implementation of another feasible alternative.” See MNPUC Order Accepting 2017 Annual Reports and Establishing Requirements for Next Annual Reports, Oct. 26, 2017.

While we encourage the Commission to approve the Company’s pilot, we would also encourage the Company and the Commission to continue to evaluate best practices in EV charging program design. This will ensure that the goals of reducing barriers to enrolling customers on an EV tariff are pursued in an efficient manner that best supports the grid and Minnesota’s EV and EV charging markets.

¹ See, e.g., Electric Power Research Institute. “Duke Energy: Charging Demos Inform PEV Readiness Planning”. 2013; Nexant. “Final Evaluation for San Diego Gas & Electric’s Plug-in Electric Vehicle TOU Pricing and Technology Study. 2014; EPRI. “DTE Energy: Driving the Motor City Toward PEV Readiness”. 2014

B. The Commission should clarify that the objective of the Company's pilot is to evaluate alternatives to additional utility meters and defer consideration of issues outside of that scope to the Commission Inquiry into EV Charging

ChargePoint respectfully urges the Commission to clarify that the overarching objective of the pilot is to evaluate options to reduce barriers to customer enrollment in EV tariffs that stem from the upfront costs of additional utility meters and defer consideration of issues outside of that scope to the Commission's Inquiry into EV Charging and Infrastructure (Docket No. E999/CI-17-879).

Certain elements of the Company's pilot are unrelated to and beyond the scope of evaluating options to reduce the upfront cost burden for customers looking to opt into an EV tariff. For example, the pilot will involve the Company recovering costs associated with owning equipment on the customer's side of the meter in the competitive EV charging market. While we believe that the ability for participants to freely choose amongst eligible EVSE largely offsets the potential competitive impact of utility cost recovery, such issues are unrelated to the upfront cost of utility meters.

ChargePoint supports the Company's proposed program design as a means to pursue the goals identified by the Commission. However, we respectfully suggest that long term decisions about the appropriate role for utilities in EV charging be evaluated and considered in the context of the Commission's Inquiry, which will focus on the following key issues:

1. The possible impacts of EVs on the electric system, utilities, and utility customers, including the potential electric system benefits;
2. The degree to which utilities and utility regulatory policy can impact the extent and pace of EV penetration in Minnesota; and
3. Possible EV tariff options to facilitate wider availability of EV charging infrastructure.²

ChargePoint applauds the Commission's initiative in engaging the wide range of regulatory issues related to EV charging. This inquiry would be the most appropriate venue to consider new roles for utilities in the competitive EV charging market. Jurisdictions around the country have begun to conduct similar inquiries, which have led to more flexible and resilient regulatory frameworks that support EV adoption, ensure that new load is well-integrated into the grid, establish sustainable and scalable roles for public utilities in EV charging, and support innovation and competition in the EVSE market.

² Notice of Commission Inquiry into Electric Vehicle Charging and Infrastructure. Dec. 28, 2017

C. The Commission should grant the Company's request for exception from meter-related rules for the purpose of evaluating EVSE technology in this pilot

ChargePoint encourages the Commission to grant the Company's request for exception from meter-related Rules 7820.3700 and 7820.3800 for the purposes of this pilot. The Commission identified the need to evaluate how to reduce the upfront cost of installing additional utility meters, which is the explicit purpose of this pilot. The Company's identified measures to ensure safety, reliability, and billing accuracy in eligible EVSE will ensure the same consumer protection for the purposes of this pilot as intended by the Rules.

III. Conclusion

Thank you for the opportunity to provide comments. We look forward to continuing this discussion and working with the Commission and utilities on smart EV charging in Minnesota.