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VIA ELECTRONIC FILING

October 18, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: Docket No. 18-643 Petition for Approval of Electric Vehicle Pilot Programs Docket No. E002/M-18-643

Dear Secretary Seuffert,

Attached for electronic filing in the above-referenced matter, please find comments by ChargePoint, Inc.

Respectfully,

/s/ Matthew Deal
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I. Introduction

On September 23, 2022, Xcel Energy (Xcel or the Company) submitted its request for Commission approval of modifications to the Fleet Electric Vehicle (EV) Pilot Service and Public Charging Infrastructure Pilots. Xcel states the modifications are necessary to bridge the gap between the end of the three-year pilot term and the Commission's final decision on broader program modification requests in Docket No. E002/M-22-432.¹ Xcel request the following changes to the Fleet EV Service and Public Charging Infrastructure Pilots:

- Extend the terms of the Fleet EV Service and Public Charging Infrastructure Pilots beyond their initial three-year terms, to continue to support existing participants and onboard new customers until there is final resolution in Docket No. E002/M-22-432.
- Allow Xcel to reallocate some or all the remaining Fleet EV Service Pilot dollars to the Public Charging Infrastructure Pilot if Fleet EV Service Pilot funding is available and not in demand by eligible fleet customers, as the Public Charging pilot is nearing budget depletion.

II. Background on ChargePoint

ChargePoint is a world leading electric vehicle (EV) charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE (EU) certified, and Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set

¹ In the Matter of the Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications.

access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

III. Comments

ChargePoint supports Xcel's request to 1) extend the terms of the Fleet EV Service and Public Charging Infrastructure Pilots beyond their initial three-year terms; and 2) allow the Company to reallocate some or all of the remaining Fleet EV Service Pilot dollars to the Public Charging Infrastructure Pilot if Fleet EV Service Pilot funding is available and not in demand by eligible fleet customers.

Given the time required for stakeholders and the Commission to consider Xcel's recent proposal in Docket No. E002/M-22-432 addressing broader program modification requests, ChargePoint urges the Commission to approve the Company's request in order to extend a variety of benefits including 1) the opportunity to gather learnings from the pilots and help optimize the experience for customers by extending the terms of the pilots and allowing for the reallocation of funds; and 2) to allow the Company to continue enrolling new customers into both pilots until the program modifications sought in the other proceeding are resolved.²

IV. Conclusion

ChargePoint supports Xcel's requested modifications and recommends Commission approval. ChargePoint thanks Xcel for its proposal for these narrow modifications to the Fleet EV Service and Public Charging Infrastructure Pilots and thanks the Commission for its consideration. We look forward to working with the Commission, the Company, and the parties to ensure that the development of Minnesota's EV charging market takes place in a manner that benefits the grid and all ratepayers and ensures that the competitive market can provide the benefits of competition to EV drivers.

² ChargePoint notes that its support of Xcel's limited proposals in its September 23, 2022 letter in this docket is not necessarily indicative of the position it will take in Docket No. E002/M-22-432.