



ChargePoint, Inc.  
254 East Hacienda Avenue | Campbell, CA 95008 USA  
+1.408.841.4500 or US toll-free +1.877.370.3802

**Stakeholder Comment**  
**Rhode Island Power Sector Transformation Principles and Recommendations**

**Comments of ChargePoint**  
**October 30, 2017**

**I. Introduction**

ChargePoint is pleased to submit comments in response to the draft Principles and Recommendations developed through the Power Sector Transformation proceeding, which were issued on October 13, 2017 through the Rhode Island Public Utilities Commission, Division of Public Utilities and Carriers, and Office of Energy Resources.

ChargePoint is a leading manufacturer of electric vehicle (“EV”) charging equipment and services. Using ChargePoint products and services, customers operate more than 41,000 Level 2 and DC fast charging spots, nearly 200 of which are 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, and grid-friendly EV charging ecosystem.

**II. Comments on Draft Principles**

**A. Beneficial Electrification**

ChargePoint welcomes the greater detail and clarification included in the principles and recommendations around Beneficial Electrification, and encourages further clarification to ensure that they can be successfully applied.

In particular, we support the principle that “any proposal should provide a platform for technology innovation” and that there be “sufficient opportunity for mid-course correction”. (Beneficial Electrification at 3). There is no one-size-fits-all EV charging solution, and any utility investment should ensure facilitate future decisions around technology, rather than picking winners.

We recommend that guidelines be clarified to be as operationally applicable as possible. For example, a draft guideline stated that “the utility may seek to develop and own EV supply equipment in areas where, absent utility intervention, market barriers might exist to deployment.” (Beneficial Electrification at 5). This could be strengthened by characterizing how the PUC would evaluate those market barriers to ensure that utility investments are not going into areas that are otherwise being served by the competitive market. This guideline could also be strengthened by clarifying that proposed utility investments must not hinder the development of the competitive EV charging market.

**B. Grid Connectivity and Advanced Meter Functionality**

ChargePoint applauds the outcome-based focus on Advanced Metering Functionality (AMF) rather than arbitrarily targeting one specific means to achieve those outcomes, such as Advanced Metering Infrastructure



(AMI). We recommend that action be taken now to modernize utility regulations to take advantage of end-use devices that can advanced functionalities, such as smart EV charging stations.

“Smart EV charging stations” is a broad term, but generally refers to the EVSE having at least the ability to meter electricity passing through the unit, provide load management and scheduled charging features, provide for point of use payment and access control, and incorporate two-way communication from the EVSE to the driver as well as the station operator. These capabilities can be of significant importance to a utility as it can provide a wealth of information related to charging behaviors and load profiles, and can also enable various demand side management programs. Those programs could include emergency curtailment via demand response, modulated vehicle charging rates, or even a TOU rate specific to just EV charging in the home through utilization of the embedded metrology.

ChargePoint’s 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.

Jurisdictions in North America are evaluating how technological alternatives to traditional utility meters can facilitate greater adoption of EVs that support widespread grid benefits. On October 5, the Minnesota Public Utility Commission ordered Minnesota Power to be the state’s second utility that would pilot how technological alternatives to traditional utility meters would support enrollment of customers into an opt-in EV time of use rate.<sup>1</sup> Similar pilots into these advanced technologies could demonstrate how advanced technologies in Rhode Island could realize greater benefits from transportation electrification at lower costs to ratepayers.

We urge the Commission to order demonstration projects that would evaluate the capability of advanced technologies to carry out functions typically undertaken by traditional utility meters.

### III. Conclusion

Thank you for the opportunity to provide these comments. We look forward to continue supporting Rhode Island as it develops a framework for maintaining and accelerating sustainable and scalable growth in the EV and EV charging markets.

Sincerely,

Kevin George Miller  
Director, Public Policy  
ChargePoint, Inc.

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<sup>1</sup> Minnesota PUC Docket No. E-015/M-15-120 – *Order Accepting 2017 Annual Reports and Establishing Requirements for Next Annual Reports.*