

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy
Kansas Metro, Inc. and Evergy Kansas
Central, Inc. for Approval of a Transportation
Electrification Portfolio

Docket No. 21-EKME-320-ACT

**PETITION TO INTERVENE
CHARGEPOINT, INC.**

ChargePoint, Inc. (ChargePoint), by and through its attorneys, C. Edward Peterson and Keyes & Fox LLP, respectfully petitions the Commission pursuant to K.S.A. 77-521 and K.A.R. 82-1-225 for permission to intervene in this proceeding with rights of full participation. In support, ChargePoint states as follows:

1. ChargePoint is one of the world's largest electric vehicle (EV) charging networks, with scalable solutions for charging at home, work, around town, and on the road. With customers that include workplaces, cities, retailers, apartments, utilities, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data.
2. ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. 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 and 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 site hosts to manage charging onsite with features like

Waitlist, access control, charging analytics, and real-time availability. ChargePoint products are UL-listed, ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

3. ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and 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 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.

4. ChargePoint's business address is 254 E Hacienda Avenue, Campbell, CA 95108.

5. In the Application that initiated this docket, Evergy Kansas Metro, Inc. and Evergy Kansas Central, Inc. (collectively, Evergy or the Company) have proposed the following incentive programs for EV charging stations: a Residential Customer EV Outlet Rebate, a Residential Developer EV Outlet Rebate, and Commercial EV Charger Rebate. Evergy also proposes two rates for EV charging customers: specifically, an Electric Transit Service Rate and a Business EV Charging Service Rate. Finally, Evergy also proposes to conduct customer education and outreach on EVs and EV charging and to expand its Clean Charge Network.

6. As a provider of EV charging equipment and network services, ChargePoint's business interests will be affected by the Commission's action with respect to the programs that Evergy has proposed in this case. Specifically, whether the proposed incentive programs are approved, denied, or approved with modifications will affect the value proposition of ChargePoint's products and services to customers in Evergy's Kansas service territory. ChargePoint's ability to qualify its products and services for Evergy's incentive programs and the Clean Charge Network expansion will also directly affect ChargePoint's ability to provide its products and services to customers in Evergy's Kansas service territory. Further, whether the Commission approves, denies, or approves with modification the EV charging rates Evergy has proposed will also affect the value proposition of ChargePoint's products and services to customers in Evergy's Kansas service territory. For these reasons, ChargePoint respectfully requests that the Commission find that ChargePoint's substantial and pecuniary interests may be affected by the Commission's final order in this docket and admit ChargePoint as a party with all associated party rights.

7. As a leading provider of EV charging infrastructure and network services that has participated in numerous proceedings before public service and public utility regulatory commissions around the country, ChargePoint will offer a valuable and informative perspective to the Commission through its participation in this docket, including information on the impact on the EV charging market and networks of the approval, denial, or modification of Evergy's proposed programs. ChargePoint's participation would therefore assist the Commission in the development of a more complete record. No party will be adversely affected by ChargePoint's participation in this case and interests of justice and the orderly and prompt conduct of the proceeding will not be impaired by allowing ChargePoint to intervene. Granting ChargePoint's intervention is therefore in the public interest.

8. Because of ChargePoint's unique product and service offerings and its unique business model, ChargePoint's interest in this case is different from that of the general public and from other parties and prospective parties.

9. To fully protect its interests, it is necessary that ChargePoint be allowed full participation in all proceedings in this docket, including, but not limited to, the right to conduct discovery, presentation of testimony and necessary pleadings, cross examination of witnesses, oral argument, briefing, and participation in such other activities and venues as the Commission may prescribe for this docket.¹

10. Pleadings, notices, and other correspondence in this case should be directed to the undersigned counsel.²

For the foregoing reasons, ChargePoint respectfully requests the Commission grant this Application to Intervene, along with any further relief the Commission deems proper.

Respectfully submitted on April 6, 2021,



C. Edward Peterson, Ks. Bar No. 11129
5522 Aberdeen
Fairway, KS 66205
Tel. 816.365.8724
Fax. 913-722-0181
Email: ed.peterson2010@gmail.com

and

Scott Dunbar
Keyes & Fox LLP
1580 Lincoln St., Suite 1105
Denver, CO 80203
949-525-6016
sdunbar@keyesfox.com
Counsel to ChargePoint, Inc.

¹ Contemporaneously with this Application to Intervene, ChargePoint will be filing signed Nondisclosure Certificates for its counsel and witnesses.

² Contemporaneously with this Application to Intervene, ChargePoint will be filing a Motion for Admission Pro Hac Vice for Mr. Scott Dunbar.

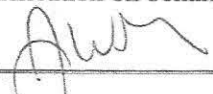
Verification

State of Colorado

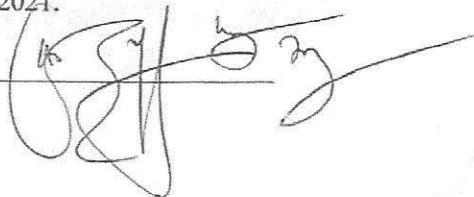
County of Denver

The undersigned, under oath first duly sworn, states that he is a Director, Public Policy, at ChargePoint, Inc., that he has read the foregoing Petition to Intervene and is familiar with the contents thereof, that the statements contained therein are true and correct to his best knowledge and belief, and that he is authorized to execute this verification on behalf of ChargePoint, Inc.

EMMANUEL ABROKWAH
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20154029277
MY COMMISSION EXPIRES JULY 27, 2023


Justin Wilson

Subscribed and sworn to before me this 19 day of March, 2021.


Notary Public

My Commission Expires: 07/27/2023

Certificate of Service

The undersigned certifies that a true and correct copy of the Petition to Intervene of ChargePoint, Inc., was served this 6th day of April, 2021 upon the following by email.

JOSEPH R. ASTRAB, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
j.astrab@curb.kansas.gov

TODD E. LOVE, ATTORNEY
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
t.love@curb.kansas.gov

DAVID W. NICKEL, CONSUMER COUNSEL
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
D.NICKEL@CURB.KANSAS.GOV

SHONDA RABB
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
s.rabb@curb.kansas.gov

DELLA SMITH
CITIZENS' UTILITY RATEPAYER BOARD
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
d.smith@curb.kansas.gov

CATHRYN J. DINGES, CORPORATE COUNSEL
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Cathy.Dinges@evergy.com

AMBER HOUSHOLDER, REGULATORY AFFAIRS, MGR
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
amber.housholder@evergy.com

LARRY WILKUS, DIRECTOR, RETAIL RATES
EVERGY KANSAS CENTRAL, INC
FLOOR #10
818 S KANSAS AVE
TOPEKA, KS 66601-0889
larry.wilkus@evergy.com

LESLIE WINES
EVERGY KANSAS CENTRAL, INC
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
leslie.wines@evergy.com

ANTHONY WESTENKIRCHNER, SENIOR PARALEGAL
EVERGY METRO, INC D/B/A EVERGY KANSAS METRO
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
anthony.westenkirchner@evergy.com

PHOENIX ANSHUTZ, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
p.anshutz@kcc.ks.gov

CARLY MASENTHIN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
c.masenthin@kcc.ks.gov

MICHAEL NEELEY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
m.neeley@kcc.ks.gov

/s/ C. Edward Peterson

C. Edward Peterson, KS. Bar No. 11129

5522 Aberdeen

Fairway, Kansas 66205

Tel. 816-365-8724

Email: ed.peterson2010@gmail.com