

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>ELECTRONIC APPLICATION OF DUKE</b>	)	
<b>ENERGY KENTUCKY, INC. FOR 1) AN</b>	)	
<b>ADJUSTMENT OF THE ELECTRIC RATES;</b>	)	
<b>2) APPROVAL OF NEW TARIFFS; 3)</b>	)	
<b>APPROVAL OF ACCOUNTING TO</b>	)	<b>CASE NO. 2019-00271</b>
<b>ESTABLISH REGULATORY ASSETS AND</b>	)	
<b>LIABILITIES; AND 4) ALL OTHER</b>	)	
<b>REQUIRED APPROVALS AND RELIEF</b>	)	

**PETITION FOR FULL INTERVENTION BY CHARGEPOINT, INC.**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), ChargePoint, Inc. (“ChargePoint”), requests that it be granted full intervenor status in the above captioned proceeding. In support of its petition, ChargePoint states:

1. 807 KAR 5:001, Section 4(11)(a)(1) requires that a person requesting leave to intervene as a party to a case before the Kentucky Public Service Commission (“Commission”), by timely motion, must state his or her interest in the case and how intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

2. 807 KAR 5:001, Section 4(11)(b) provides that the Commission shall grant leave to intervene if the Commission finds he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. ChargePoint is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 254 East Hacienda, Ave. Campbell, California, 95008.

4. Founded in 2007, ChargePoint operates the nation's leading electric vehicle charging network, with more than 100,000 places to charge around the world. ChargePoint designs, manufactures, installs, and maintains Level 2 and DC fast charging stations, and operates a cloud-connected charging network to manage charging activities. ChargePoint has more than 75 public charging ports in Kentucky. ChargePoint is an industry leader in networked charging stations, and proactively engages regulatory and legislative policy dialogues involving the rapidly growing and competitive market for electric vehicle charging equipment and services. Accordingly, ChargePoint regularly participates in regulatory proceedings before utility commissions across the country when issues related to electric vehicle charging infrastructure, networks, or rates are within the scope of such proceedings.

5. ChargePoint has a direct and substantial interest in the outcome of these proceedings, and its interests will be directly affected by the discussion and resolution of the topics covered therein. ChargePoint's position and market presence within this State relates directly to the details of Duke Energy Kentucky, Inc.'s proposal. ChargePoint has substantial and specific economic interests in the sustainable and scalable growth of EV charging infrastructure within Kentucky. ChargePoint currently sells electric vehicle charging equipment and services directly to consumers in Kentucky.

6. ChargePoint has timely filed its motion to intervene in this proceeding.

7. ChargePoint's interest is not adequately represented by any other party, and

ChargePoint should not be consolidated with any party or group of parties. ChargePoint's intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matters at hand. ChargePoint intends to play a constructive role in the Commission's decision-making process and will not unduly complicate or disrupt the proceedings.

8. All correspondence related should be addressed to the following attorney who is authorized to represent ChargePoint:

Thomas M. Hancock, Esquire  
(KY Bar No. 97428)  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
949 Third Avenue, Suite 200  
Huntington, West Virginia 25701  
Telephone: (304) 526-3500  
Facsimile: (304) 526-3599  
tom.hancock@nelsonmullins.com

WHEREFORE, ChargePoint respectfully requests that the commission allow it to intervene in this proceeding, and become a party thereto for all purposes.

Respectfully submitted, this 2<sup>nd</sup> day of October, 2019.



By: \_\_\_\_\_

Thomas M. Hancock, Esquire  
(KY Bar No. 97428)  
**NELSON MULLINS RILEY & SCARBOROUGH  
LLP**  
949 Third Avenue, Suite 200  
Huntington, West Virginia 25701  
Telephone: (304) 526-3500  
Facsimile: (304) 526-3599  
[tom.hancock@nelsonmullins.com](mailto:tom.hancock@nelsonmullins.com)  
**COUNSEL FOR CHARGEPOINT, INC.**

## CERTIFICATE OF SERVICE

The undersigned attorney for ChargePoint, Inc. hereby certifies that he transmitted Petition to Intervene to the Commission for electronic service upon the parties of record in this proceeding by electronic mail and that there are no parties excused from participation by electronic means, and that an original and one copy of the filing in paper will be delivered to the Commission within two (2) business days.

This 2<sup>nd</sup> day of October, 2019.



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Thomas M. Hancock, Esq.