

*July 30, 2018*

## **I. Introduction & Background**

### **A. Introduction**

ChargePoint is pleased to provide comments on the Order Opening Investigation issued by the Vermont Public Utilities Commission (“the Commission”) in Case No. 18-2660-INV – Investigation into promoting the ownership and use of electric vehicles in the State of Vermont.

### **B. 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 52,000 independently owned public and semi-public charging spots, including more than 270 in Vermont, and thousands of 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 40 million charging sessions, saving upwards of 40 million gallons of gasoline and driving more than 975 million gas-free miles.

## **II. Comments**

ChargePoint appreciates the broad scope of the task before the Commission, as well as the deadlines under which the Commission is operating. We are committed to supporting the Commission in preparing its report by providing insights in deploying tens of thousands of EV charging stations and the associated utilization data.

ChargePoint defers to the Commission for its determination of the most appropriate structure for addressing the wide range of issues identified in Act 158 of the 2017-2018 Vermont legislative session. However, we would encourage the Commission to dedicated sufficient time to build a foundational understanding of the range of business models for EV charging, specific barriers to deployment of EV charging stations stemming from upfront capital and ongoing operating costs, how incentives can be aligned to ensure sustainable growth in Vermont’s EV and EV charging markets, and different means for ensuring that transportation electrification increases equitable access to electric transportation

## **III. Conclusion**

Thank you for the opportunity to provide comments as the Commission begins its investigation. We look forward to serving as a resource to the Commission throughout the course of this proceeding.