

Docket No. UM 1810
Exhibit PAC/303
Witness: Eli M. Morris

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

**Exhibit Accompanying Reply Testimony of Eli M. Morris
ChargePoint Response to PacifiCorp Data Request 13**

October 2017

ChargePoint Data Request Responses to Pacific Power

PAC-13. Please identify and produce all studies, workpapers, analyses, internal memorandum, or other documents supporting the statement at ChargePoint/200, Packard 14:6-8 that “prospective site-hosts who may be considering investing in publicly available charging stations would be much less likely to do so when they learned that Pacific Power was providing charging stations”

- a. In your response, please identify specific instances where a prospective site host declined to develop a public charging station due to the existence of utility-owned charging stations.
- b. Please identify and produce all workpapers, analyses, internal memorandum, or other documents relating to your response to subpart (a).

Response:

ChargePoint objects to PAC-13. This request seeks information related to ChargePoint’s customers and potential customers. This information is confidential and proprietary to ChargePoint, the release of which would cause significant competitive harm to ChargePoint. ChargePoint further objects to PAC-13 because Pacific Power seeks the Commission’s authorization to begin competing with ChargePoint through its Public Charging program, and it is highly burdensome and prejudicial to require ChargePoint to provide confidential information to a potential competitor.

Notwithstanding and without waiving the above objections, ChargePoint responds as follows:

The referenced statement is based on Mr. Packard’s expertise and his 19 years of experience in the EV charging industry. He explains his reasons for reaching this conclusion throughout ChargePoint/200.

Sponsor: David Packard

Sponsor of Objections: Scott Dunbar

Date: October 20, 2017