

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF INDIANAPOLIS)
POWER & LIGHT COMPANY D/B/A/ AES)
INDIANA FOR COMMISSION APPROVAL)
OF AN ELECTRIC VEHICLE PORTFOLIO,)
INCLUDING CUSTOMER OFFERINGS) CAUSE NO. 45509
SUCH AS AES INDIANA MOTOR,)
MANAGED CHARGING, AND OFF-PEAK)
INCENTIVE, AND FOR APPROVAL OF)
ASSOCIATED ACCOUNTING AND)
RATEMAKING)

PETITION TO INTERVENE OF ZECO SYSTEMS, INC. D/B/A GREENLOTS

Zeco Systems, Inc. d/b/a Greenlots (“Greenlots”), by counsel, pursuant to 170 IAC 1-1.1-11, petitions to intervene in and be made a party to the above-captioned proceeding before the Indiana Utility Regulatory Commission (“Commission”). In support of this Petition to Intervene, Greenlots states that:

1. Greenlots is a corporation organized and existing under the laws of the State of Delaware and headquartered in California. Greenlots’ principal place of business is located at 767 S. Alameda Street, Suite 200, Los Angeles, CA 90021.
2. Greenlots is a leading provider of electric vehicle (“EV”) charging software and a member of the Shell Renewables & Energy Solutions group. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of the Level 2 infrastructure. Greenlots’ smart charging solutions are built around an open standards-based focus on future flexibility while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and improve system efficiency.
3. The Greenlots network is also supporting the deployment of Shell Recharge, which in the U.S. is beginning to be deployed to provide Shell’s retail customers—including convenience stores, service stations, and drivers—on the go charging.

4. On March 2, 2021, Indianapolis Power & Light Company D/B/A AES Indiana (“AES”) filed its Verified Petition in this Cause requesting Commission approval of an Electric Vehicle Portfolio (“EV Portfolio”) and associated accounting and ratemaking and other related relief set forth in the Petition. As a part of its EV Portfolio, AES proposes to establish three offerings including Residential Managed Charging, an AES Indiana Motor platform to facilitate EV transactions, and an Off-Peak EV Charging Incentive.

5. Any determination by the Commission in this Cause will have a direct and substantial impact on Greenlots and its business operations and activities in the State of Indiana. As a provider of EV charging software, equipment, and services to a range of clients, including utilities, Greenlots has a special interest in the proposed EV offerings and services provided by AES. Specifically, Greenlots has a significant interest in the growth of electric vehicle charging infrastructure, the role of utilities in scaling the market for electric vehicle charging infrastructure, and in regulatory developments that affect this landscape.

6. Greenlots’ position and interest in this Cause will not be adequately represented by existing parties to the proceeding. Greenlots is aware that ChargePoint, Inc., is an intervenor in this cause, but ChargePoint cannot represent the interests of all EV charging companies. Notably, ChargePoint and Greenlots have similar but differentiated business models, and different market perspectives.

7. Greenlots’ intervention and participation in this proceeding will not unduly broaden the issues or otherwise burden the proceeding. Greenlots will focus its attention on AES’s proposed EV Portfolio and present issues and facts related to those proposed offerings and the broader EV industry.

8. Greenlots understands that it is bound by the record as it stands at the time its Petition to Intervene is granted.

9. Names and addresses of Greenlots' representatives who are authorized to be served with pleadings, orders, docket entries and other documents filed in this matter are:

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10. Greenlots files this Petition to Intervene at least five days prior to the date set for the initial evidentiary hearing in this matter.

WHEREFORE, Greenlots respectfully requests that the Commission grant its Petition to Intervene, permit Greenlots to become a party to this Cause and for all other just and proper relief.

Respectfully submitted,

By: /s/ Erin C. Borissov

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 18th day of August, 2021, by email transmission, or United States Mail, first class, postage prepaid to:

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