



## Filing Receipt

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<b>APPLICATION OF ENTERGY TEXAS, INC. FOR AUTHORITY TO CHANGE RATES</b>	) ) )	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**CHARGEPOINT, INC.'S RESPONSES TO  
ENTERGY TEXAS, INC'S  
FIRST REQUEST FOR INFORMATION**

ChargePoint, Inc. (ChargePoint) hereby timely provides its responses and objections to Entergy Texas Inc.'s (ETI) First Request for Information (RFI) to ChargePoint, served on November 1, 2022. Pursuant to 16 TAC § 22.144(c)(2)(F), ChargePoint stipulates that its responses may be treated by all parties as if they were made under oath.

Respectfully submitted,

/s/ Lucas A. Fykes  
Lucas A. Fykes  
Ohio Bar No. 98471  
Keyes & Fox LLP  
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*Counsel to ChargePoint, Inc.*

Dated: November 8, 2022

**ETI-CP 1-1**

**Please provide, in native format, all workpapers and documents supporting the testimony of each witness filing testimony on your behalf in this proceeding. Please ensure all formula and cells are intact.**

**Response**

No workpapers or other documents were used by Mr. Wilson in preparing his direct testimony.

## **ETI-CP 1-2**

**For each testifying expert, please provide:**

- a. A list of all cases in which the testifying expert has submitted testimony, from 2015 to the present;**
- b. Copies of all prior testimony, articles, speeches, published materials, and peer review materials written by the testifying expert, from 2015 to the present;**
- c. The testifying expert's billing rate for this proceeding; and**
- d. All documents provided to, reviewed by, or prepared by or for the testifying expert in anticipation of the testifying expert filing testimony in this proceeding.**

## **Response**

- a. ChargePoint objects to Data Request No. 1-2(a) because it seeks data that is not relevant to this proceeding. The subjects of this proceeding are ETI's rate proposals. The regulatory proceedings in which Mr. Wilson has submitted testimony are not relevant to the Commission's evaluation of ETI's proposals. ChargePoint further objects to Data Request No. 1-2(a) because it is unduly burdensome. Mr. Wilson has submitted testimony in a significant number of regulatory proceedings and it would be unduly burdensome for ChargePoint to create a list of all such proceedings. ChargePoint further objects to Data Request No. 1-2(a) because it seeks information that is publicly available and therefore available to ETI. All testimony Mr. Wilson has filed in any regulatory proceeding is a matter of public record.

Notwithstanding and without waiving the above objections, ChargePoint responds as follows: ChargePoint regularly engages in regulatory proceedings involving electric

vehicles and electric vehicle charging infrastructure around the US and Mr. Wilson has submitted testimony on behalf of ChargePoint in many of the proceedings in which ChargePoint is a party since joining ChargePoint in 2019.

- b. ChargePoint objects to Data Request No. 1-2(b) because it seeks data that is not relevant to this proceeding. The subjects of this proceeding are ETI's rate proposals. Testimony that Mr. Wilson has submitted in other proceedings are not relevant to the Commission's evaluation of ETI's proposals. ChargePoint further objects to Data Request No. 1-2(b) because it is unduly burdensome. Mr. Wilson has submitted testimony in a significant number of regulatory proceedings and it would be unduly burdensome for ChargePoint to collect all such testimony. ChargePoint further objects to Data Request No. 1-2(a) because it seeks information that is publicly available and therefore available to ETI. All testimony Mr. Wilson has filed in any regulatory proceeding is a matter of public record.

Notwithstanding and without waiving the above objections, ChargePoint responds as follows: All of the testimony Mr. Wilson has submitted on behalf of ChargePoint in regulatory proceedings in other states are public records that are accessible to ETI. Mr. Wilson has not published any articles, speeches, published materials, or peer review materials since joining ChargePoint in 2019.

- c. Mr. Wilson is an internal ChargePoint employee and therefore does not have a “billing rate for this proceeding.”
- d. Refer to the Direct Testimony of Justin D. Wilson, filed on October 26, 2022 and the references cited therein.

Respectfully submitted on November 8, 2022,

/s/ Lucas A. Fykes  
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**Certificate of Service**

I, Lucas Fykes, certify that a copy of the foregoing CHARGEPOINT, INC.'S RESPONSES TO ENTERGY TEXAS, INC'S FIRST REQUEST FOR INFORMATION has been served electronically on each Party of Record on November 8, 2022.

/s/ Lucas Fykes