

REQUESTOR NAME: BCOAPO
INFORMATION REQUEST ROUND NO: 1
TO: CEC
DATE: May 15, 2018
PROJECT NO: 1598941
APPLICATION NAME: BCUC Inquiry into the Regulation of
Electric Vehicle Charging Service

1.0 Reference: Exhibit C24-2, page 32 (paragraph 3.23)

1.1 Please specify what aspects of the Class Exemption for BC Hydro Customers that Resell Electricity Under Certain Lease Agreements model CEC considers would be appropriate to apply to EV charging stations?

2.0 Reference: Exhibit C24-2, page 35 (paragraph 3.38)

2.1 Please describe how “simple reporting” will ensure that mark-ups on the resale of electricity are within reasonable limits (particularly in the case of DCFC where the number of suppliers and/or locations may be limited per paragraph 3.43)?

3.0 Reference: Exhibit C24-2, page 36 (paragraphs 3.48 & 3.49; page 39 (paragraph 4.4) and page 48 (paragraph 5.13)

3.1 At page 39, CEC states that it does not support a separate EV tariff for sale of power by the utility to station owners. This view is re-iterated on page 43. However, at page 36 CEC states that TOU rates could be utilized to manage demand and optimize use of transmission and distribution systems. On that same page, CEC states that commercial charging stations could be assessed a special tariff that reflected the price of future upgrades and build-outs.

3.1.1 Please reconcile the statements that there should not be a separate EV tariff with the view that commercial charging stations could be assessed a TOU or special rate.

3.1.2 Is it reasonable to assume that EV station owners will adopt TOU pricing structures if they are not charged TOU rates for their power supply?

3.1.3 If EV stations were to adopt TOU pricing structures, in the absence of being charged TOU rates, how, in CEC’s view, would such pricing structures be developed so as to be reflective of EV station users “cost impacts” on the utility’s distribution and transmission systems?

4.0 Reference: Exhibit C24-2, page 42 (paragraph 4.30); page 44 (paragraph 4.37) and page 49 (paragraph 6.9)

Preamble: At page 42 the Evidence states that: “profitable resale of the electricity commodity could facilitate the establishment of a DCFC charging network”.

At page 49, the Evidence states that: “utility participation in providing fast charging stations on long distance highway corridors may be useful to temporarily fill a gap”.

At page 44, the Evidence states that: “it would be reasonable to base (utility) rates (for EV charging service) on its cost of service rather than a formula or subsidized rate”.

- 4.1 Is it reasonable to expect that a utility’s cost of service for providing EV charging services could differ from and be lower than that of a third-party private sector provider (e.g., utility may have a lower cost of capital)?
- 4.2 If yes, mightn’t permitting utilities to offer DCFC services priced at their more favourable “cost of service” undercut the profitability of 3rd party providers and create a barrier to their entry into the market?