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May 15, 2018

VIA EMAIL - LTREMLBLAY@ADDENERGIE.CA

AddÉnergie Technologies Inc.
c/o DeMarco Allan LLP
#200 - 5 Hazelton Avenue
Toronto, Ontario
M5R 2E1

Attention: Travis J. Allan, Partner

Dear Sirs/Mesdames:

Re: British Columbia Utilities Commission Inquiry into the Regulation of Electric
Vehicle Charging Service ~ Project No. 1598941

We are counsel to the Commercial Energy Consumers Association of British Columbia (the "CEC"). Attached please find the CEC's Information Request on written evidence with respect to the above-noted proceeding.

If you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Yours truly,

OWEN BIRD LAW CORPORATION



Christopher P. Weafer

CPW/jj

cc: BCUC – Atten: Patrick Wruck, Commission Secretary
cc: Registered Interveners
cc: CEC

**COMMERCIAL ENERGY CONSUMERS ASSOCIATION
OF BRITISH COLUMBIA (“CEC”)**

INFORMATION REQUEST NO. 1 TO ADDÉNERGIE TECHNOLOGIES INC. (“ATI”)

**British Columbia Utilities Commission – Inquiry into the Regulation of Electric Vehicle
Charging Service ~ Project No. 1598941**

May 15, 2018

1. Reference: Exhibit C20-2, Page 2

21 (i) Direct current fast charger (DCFC) and multi-unit residential building (MURB) home
22 charging are unlikely to be widely and comprehensively deployed in British
23 Columbia without public utility involvement because of the current economic
24 barriers facing charging providers and still-emerging demand for EV charging in
25 many parts of the province. Curbside public charging faces similar cost and also
26 regulatory challenges that are likely to inhibit its widespread deployment.

1.1 If the regulatory challenges are remedied does ATI expect that the economic challenges can be met or does ATI view the economic challenges as somewhat independent needing early stage market incentives if the market is to move at a quick pace?

2. Reference: Exhibit C20-3

3 (iii) Allowing utilities to ratebase charging infrastructure is an appropriate response to
4 this barrier so long as it create a comprehensive and robust charging network that
5 achieves quality standards.

2.1 Allowing the utilities to have all ratepayers cover the costs of uneconomic service for charging stations in the early market stage is one solution. Would ATI find it equally a solution if the private sector had access to the same levels of subsidy as the utilities?

2.2 Might it lead to a more robust charging network if the power of the market was incented to participate in developing the network where early economic barriers would slow the development?

3. Reference: Exhibit C20-2, Page 3

23 Private investors are unlikely to invest in public DCFCs at the scale required to permit
24 comprehensive provincial coverage because they are unlikely to recover costs within 10 years
25 based on current capital expenditure costs and electricity demand charges under BC Hydro's
26 and Fortis BC's current rate structures.

- 3.1 FortisBC in its application for rate design has indicated a much faster track to economic breakeven. Does ATI expect that FortisBC would be any more capable than the private sector to deploy DCFC stations under a level playing field of similar subsidies as FortisBC is proposing and similar electricity rates?
- 3.2 Does ATI expect that the private sector, given the economic subsidy and electricity pricing context utilities would have, could work with municipalities and MURBs to solve curbside charging and MURB charging equally as well as the electric utilities?

4. Reference: Exhibit C20-2, Page 5

21 AddÉnergie submits that customers of EV charging stations do not currently have access to a
22 competitive EVSE market in many areas of British Columbia. For the reasons set out above,
23 many areas of British Columbia are undersupplied with DCFC and on-street charging, meaning
24 there is no or very limited choice in the selection of public charging stations. This undersupply is
25 likely to especially impact EV users who are on long trips (i.e., greater than their car's range,
26 such as inter-municipal travel) and EV users who are not able to access home charging, such as
27 MURB residents in older buildings that are expensive to retrofit with EV chargers.

- 4.1 At what quantity of DCFC charging stations in BC does ATI expect that there would be a sufficiently robust network of charging supply to incent more substantial growth of the EV market?

5. Reference: Exhibit C20-2, Page 6 & 7

25 As the Commission is aware, provincial sales tax (PST) levied on the provision of electricity is
26 lower than on other services in British Columbia.⁷ In making its order under this proceeding,

1 AddÉnergie requests that the Commission provide a clear statement as to whether EV charging
2 services constitute the purchase of electricity consistent with the Commission's other findings
3 in this inquiry.

- 5.1 The Provincial Government has made it clear that it will welcome recommendations from the Commission on the policy, legislative and regulatory context that the Province should adopt in support of the EV market development. Would ATI support a recommendation

to the Province that charging station owners be exempted from taxes of various kinds that might impede the development of the market for a tax holiday of up to a specific period of time when it is likely there will be a more robust charging market?

6. Reference: Exhibit C20-2, Page 8

2 AddÉnergie submits that the dependability and quality of public charging services provided to
3 the consumer should be a central consideration in rate setting. Providing quality equipment,
4 maintenance, monitoring and timely repairs is essential to building consumer trust and to avoid
5 safety and convenience concerns that can result from consumers being stranded at low-quality
6 or inadequately maintained charging infrastructure. Quality and dependability can be
7 supported both by: (i) approving utility rates sufficient to cover appropriate infrastructure and
8 operating costs; and (ii) providing performance standards against which investments in public
9 charging will be measured. Potential performance metrics provided for the Commission's
10 consideration are included under Section 7, below.

6.1 Would ATI find it useful if the Commission had light handed regulation setting out modest performance standards and annual reporting or certification of meeting standards, regulating on a complaint basis or should quality be left to the market as a differentiation between suppliers?

6.2 Would ATI prefer the performance standard and accountability process to be in an EV association or to have the potential authority of the Commission backing the process?

7. Reference: Exhibit C20-2, Page 10

- 16 • providing connection infrastructure to the distribution grid to supply charging
17 stations in the workplace and commercial parking lots;
- 18 • supporting the deployment of EVSE at home;
- 19 • factoring in EVSE in conservation and demand management programs to support
20 appropriate charging behavior and times in residential and workplace charging; and
- 21 • supporting the deployment of DCFC by permitting multiple electrical meters per site
22 and per address (based on the number of DCFC being deployed).

7.1 Would ATI have any other issues which would need addressing and that would specifically need support from various levels of government?