



March 28, 2019

Mr. Patrick Wruck
Commission Secretary
British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

This is the final argument of Her Majesty the Queen in Right of the Province of British Columbia, as represented by the Minister of Energy, Mines and Petroleum Resources (MEMPR), in the second phase of the Inquiry into the Regulation of Electric Vehicle Charging Service (Project No. 1598941).

MEMPR thanks the Panel for considering its procedural conference submissions and narrowing the scope of final argument in response. MEMPR supports the Panel's comments on outcomes for each scope item and believes that these comments will be of great assistance to interveners as they prepare final and reply arguments. MEMPR agrees with the distinctions the Panel has made between scope items where high-level guidance to public utilities would be beneficial for the purposes of future applications versus those where recommendations to Government would be beneficial. MEMPR also appreciates the Panel's intention to provide recommendations to the Province on scope items 13 and 14 as soon as possible following receipt of final and reply argument.

In light of the revised scope, the Panel's comments on outcomes and the Panel's request to avoid unnecessary duplication, MEMPR will not be making any new submissions during final argument. However, MEMPR would like to take this opportunity to reiterate several key points it has made in previous submissions during both phases of this Inquiry.

The Province is taking a variety of actions to reduce greenhouse gas emissions in the transportation sector. The Province's 2018 CleanBC plan sets out escalating targets for annual percentage of new light-duty zero-emission vehicle sales: 10% by 2025; 30% by 2030; and 100% by 2040.

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MEMPR believes that significant investments in electric vehicle (EV) charging infrastructure will be necessary in order to meet the CleanBC plan sales targets. In 2011, the Province introduced the Clean Energy Vehicle (CEV) Program, which was designed to reduce barriers to the adoption of CEVs, including the cost and availability of new vehicles and the availability of charging infrastructure. Through the CEV Program, the Province has provided funding for:

- vehicle point-of-sale incentives;
- charging infrastructure incentives / investments (Level 2 and DC fast-charging);
- hydrogen fuelling station investments;
- fleet incentives for adopting CEVs; and
- research, training, and public outreach.

MEMPR supports a role for both traditional public utilities, such as BC Hydro and FortisBC, and other entities in delivering EV charging services. The Minister has approved the British Columbia Utilities Commission's order from Phase 1 of this Inquiry that exempted landlords, strata corporations and entities who are not otherwise public utilities from portions of the *Utilities Commission Act*. In co-operation with the Federal Government, the Province has provided, and intends to continue providing, funding for charging infrastructure that is available to both exempt and non-exempt public utilities.

MEMPR believes that all ratepayers can benefit from a non-exempt public utility's investments in EV charging services. When considering scope items 1 and 3 through 6, MEMPR asks the Panel to consider its earlier submissions relating to the potential economic and environmental benefits that could accrue to all ratepayers from a public utility's investments in EV charging services, as outlined in Exhibit C19-12.

If you have any questions regarding this submission or require any further information, please contact Shannon Craig at Shannon.Craig@gov.bc.ca or 778-698-7016.

Sincerely,



Les MacLaren
Assistant Deputy Minister
Electricity and Alternative Energy Division