

To: Commission Secretary BCUC:EX
Subject: FW: Final Argument, EV Inquiry, Phase 2
Date: Thursday, March 28, 2019 2:13:02 PM
Attachments: [Final Argument Phase 2.docx](#)

From: Richard Tennant [mailto:vanportecologies@gmail.com]
Sent: Thursday, March 28, 2019 2:06 PM
To: Commission Secretary BCUC:EX
Subject: Final Argument, EV Inquiry, Phase 2

Please see attached regarding above subject matter

Thank you

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Final Argument on Revised Scope

With regard to the the BCUC's recommendation to make electric vehicle (EV) charging service providers who are not otherwise public utilities (i.e. landlords, strata corporations or parkades) EXEMPT from Part 3 of the Utilities Commission Act, this recommendation leaves open the question of which side of the exempt or non-exempt argument that the long-proposed VSI merchant pumped hydro storage plants would fall.

Specifically, BC Hydro has stated that only it alone could operate any merchant pumped hydro storage plant dedicated to the supply of wholesale electricity. It also has/had a policy that would not allow an IPP-owned run-of-river plant to connect into a hydroelectric storage reservoir, a policy that also effectively prevented it from considering the development of our run-of-river hydro reservoir-connected commercial sewage reclaim-treatment pipelines that we believe are likely to accelerate development of a carbon-controlled hydrogen-electric vehicle economy while also proving to be far more cost-effective and profitable for municipal taxpayers than current waste-to-energy sales contracts.

Certainly, an exempt commercial parkade also could function as a merchant pumped hydro plant whereby an empty parkade floats and is raised by a column of water that is then gravity-discharged under the weight of the vehicles to run a hydroelectric turbine for the purpose of wholesaling the energy needed by a retail charging station or a related community bulk energy storage operation.

With regard to the issue of safety we reiterate that the BCUC should undertake to design the framework needed to ensure both the safe recycle of li-ion batteries as well as the installation and operation of hydrogen retail gas station equipment used to fuel EV's, as well as consideration for ensuring the safety of home solar electrolyzers and/or for parkade/strata/landlords engaged in on-site production.

Hopefully, the panel also will recommend that the VSI-proposed merchant pumped hydro plants at JOR and/or Britannia Mines are deserving of the requested feasibility study that also could determine if such an operation can be a an exempt EV charging service provider that will not need BCUC approval to set rates for wholesaling energy to EV charging services providers in British Columbia, and thereby attracting private investment in developing the EV fueling market.
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