

April 10, 2019

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck,
Commission Secretary

Re: Project No. 1598941, British Columbia Utilities Commission (BCUC or Commission),
An Inquiry into the Regulation of Electric Vehicle Charging Service –
Phase 2 British Columbia Hydro and Power Authority (BC Hydro),
Final Reply on Revised Scope

Dear Mr Wruck:

After reviewing the submissions of the other participants, I believe matter has been thoroughly discussed. I have no new reply submissions, but would like to briefly re-state my position for the Panel.

I support:

- The efforts to reduce GHGs;
- L1 and L2 charging stations being exempt from regulation except on complaint;
- Technical Safety BC setting the safety inspection requirements;
- The DCFCs being classified as a prescribed undertaking;
- BC Hydro, FortisBC, and other regulated non-exempt public utilities participating in providing DCFCs;
- BC Hydro's Final Reply comment "...it would be prudent to wait for the Province's proposed legislative changes before making any detailed determinations with respect to those issues."
- A cap on any cross-subsidies that may be employed;
- The future submission of a CPCN application for the DCFCs, if required;
- Urban and rural rates for DCFC stations; and
- The development of electrified mass transit over personal use EVs.

I oppose:

- L3 charging stations (DCFC) being exempt from regulation unless as part of a prescribed undertaking;
- Cost recovery of stranded assets from the ratepayers;
- Cross-subsidies for DCFCs as they only benefit those who can afford EVs; and
- The cost burden and risks of stranded assets being assigned to the ratepayers instead of the taxpayers.

Regards,

Donald Flintoff