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Patrick Wruck

Commission Secretary
British Columbia Utilities Commission
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Vancouver, BC V6Z 2N3

Travis J. Allan

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Dear Mr. Wruck:

Re: British Columbia Utilities Commission (the Commission) – An Inquiry into the Regulation of Electric Vehicle Charging Service – Project Number 1598941 – Phase 2

AddEnergie thanks the Commission for its leadership throughout this Inquiry process and looks forward to reviewing its forthcoming recommendations. In light of the Commission's request to avoid unnecessary repetition, AddEnergie will only make one minor clarification in its reply submission.

AddEnergie wishes to clarify that it supports amendments to the BC Greenhouse Gas Reduction Regulation (GGRR) as a means of achieving British Columbia's electrified transportation objectives, even if there are other approaches that could permit utility investment. One intervenor's final submission included a partial quote from AddEnergie's submission on the GGRR.¹ To avoid any confusion and ensure that the Commission has full context, AddEnergie reproduces its submission on this point (as set out at p. 3 of Exhibit C20-7) here:

AddEnergie supports a recommendation for inclusion of EV charging in the BC Greenhouse Gas Reduction Regulation (GGRR), but for the reasons stated above, and explained in more detail below, AddEnergie believes that a GGRR amendment is not required to justify rate-based investment by non-exempt public utilities in public EV charging.

This submission was further discussed at p.11 of Exhibit C20-7.

To be clear, AddEnergie is supportive of amendments to the GGRR to allow non-exempt public utilities to own and operate EV charging stations as a prescribed undertaking (or by whatever mechanism government deems most appropriate to ensure their participation.) However, AddEnergie takes the position that the proposed amendments are not a necessary condition for non-exempt public utility involvement in developing public EV charging infrastructure. Non-exempt public utilities should be permitted to fund such infrastructure through their rate base whether or not an amendment is adopted.

¹ ChargePoint Final Submission: Phase 2, p. 2, footnote 6.



AddEnergie remains supportive of steps taken (through amendments to the GRR or otherwise) to promote non-exempt public utility involvement in building reliable and convenient public EV charging infrastructure in British Columbia.

Again, AddEnergie would like to thank the Commission for its work on this proceeding and the opportunity to participate.

Should you have any questions, please contact the undersigned.

Sincerely,

[Electronically Submitted]

Travis J. Allan