



April 10, 2019

-VIA ELECTRONIC FILING-
Project No. 1598941

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

RE: Greenlots Reply Argument on Revised Scope in Phase Two in the Matter of BCUC's Inquiry into the Regulation of Electric Vehicle Charging Services

Dear Secretary Wruck,

In response to the British Columbia Utilities Commission's ("BCUC" or "the Commission") March 6, 20189 Order Number G-50-19 ("the Order"), inviting final and reply arguments on the revised scope of Phase 2 of the Inquiry as described in that Order, Greenlots offers the following brief submission.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification in British Columbia. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in BC and North America. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions.

As with several other parties, Greenlots did not submit a final argument following the Commission's Order and the February 27, 2019 Procedural Conference that preceded it. Given the developments at the Procedural Conference, and the Panel's request for parties to "avoid unnecessary repetition," observing that "many parties have provided their argument already," Greenlots having largely already made its positions known through previous submissions, did not find it necessary to further burden the record. In keeping with this, Greenlots will briefly highlight intervenor final arguments with which we agree and in relation to our core positions. For a deeper discussion of the various scoped items, we reference our January 28th written evidence for Phase II.¹

Greenlots largely and broadly agrees with the final arguments and submissions of the BC Sustainable Energy Association and Sierra Club BC (BCSEA-SCBC), the Minister of Energy, Mines and Petroleum Resources (MEMPR), BC Hydro, and FortisBC (FBC). Additionally, while AddEnergie, Siemens, and the Alliance for Transportation Electrification similarly did not submit a final argument, we also broadly agree with their positions as articulated in their Phase II

¹ Exhibit C15-7

written evidence submitted earlier.² These submissions broadly align with previously submitted Greenlots' arguments and positions regarding the role of non-exempt utilities in advancing transportation electrification in British Columbia, and our recommendations for Commission action.

Indeed, the Commission's revised scope following the Government's submissions at the Procedural Conference also broadly comports with the views of Greenlots and these other intervenors. As the Panel determined, indeed "there is a role for nonexempt utilities in providing public EV charging services."³ As many parties have submitted, direct utility investment in charging infrastructure results in increased opportunities for all market participants. Beyond direct utility procurement, other market participants benefit from improved economics associated with investing in charging infrastructure, as the utility investment accelerates EV adoption, thereby increasing utilization of non-utility infrastructure. At this stage of the market, critically, this positions utility investment as a market catalyst, rather than a market constraint. Additionally, this investment results in environmental and economic benefits that accrue back to all ratepayers and society at large. For these reasons, concerns of the private market "being undercut by non-exempt public utilities" are largely overblown, when instead focus should be on supporting the role of these non-exempt public utilities and their ability to accelerate the market.

Additionally, while Greenlots has commented in depth previously on many detailed and nuanced topics such as rate design, tariff provisions, stranded assets, and cost of service, we agree with other parties that high-level recommendations and general principles are likely more appropriate and helpful than detailed determinations better suited for evaluation within the context of a specific application or program. An example of a high-level recommendation that Greenlots would support, for reasons previously articulated, would be the Panel through guidelines it issues endorsing non-exempt public utilities adopting industry-accepted open standards and data communication protocols. This guidance would support interoperability and competition in the procurement of EV charging hardware and software and provision of EV charging services. It would also represent a prudent measure to guard against stranded asset risks.

Finally, as it relates to recommendations this Panel should make to the government, Greenlots reiterates that while EV charging is already a "prescribed undertaking" under the Greenhouse Gas Reduction Regulation (GGRR), additional clarity specific to EV charging services is desirable and something this Panel should recommend. While amendments to the GGRR related to EV charging services, as BC Hydro previously proposed, and Greenlots and others supported, represents one pathway for doing this, there may be others that the provincial government can also exercise to provide this clarity. Regardless of the mechanism ultimately employed, Greenlots

² Exhibit C20-7, C38-2 & C36-2

³ Order Number G-50-19 at p. 4

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strongly supports the Panel including in its recommendations to the Province support for a mechanism to provide this clarity, with the aim of furthering the involvement of non-exempt public utilities in advancing transportation electrification.

Greenlots appreciates the opportunity to provide these reply arguments, and the Commission's consideration of them. Greenlots looks forward to continuing to supporting the Commission's work and ongoing information gathering, analysis and planning efforts.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP, Policy
tom@greenlots.com