From: Commission Secretary BCUC:EX
Sent: Thursday, April 11, 2019 8:12 AM
To: Web Administrator BCUC:EX
Subject: FW: BCUC Inquiry into the Regulation of EV Charging Service, Phase 2
Attachments: Reply to Interveners Final Argument.docx

For EV Inquiry.

From: Richard Tennant <vanportecologies@gmail.com>
Sent: April 11, 2019 5:22 AM
To: Commission Secretary BCUC:EX <Commission.Secretary@bcuc.com>
Subject: BCUC Inquiry into the Regulation of EV Charging Service, Phase 2

Dear Commission Secretary

Please see attached regarding above subject matter

This attachment supercedes previous mis-filing as phase I 'Response'

My apologies

Thanks again for your consideration

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Reply to Interveners Final Argument, Phase 2

Other interveners did not address H2 fuel cell EV's or the use of merchant pumped hydro plants to supply electricity and hydrogen energy for consideration in fueling EV charging stations. Only VSI addressed the need to rethink EV energy security and wholesale supply options beyond public financed approaches.

VSI has argued that this nascent industry could be well served by taking advantage of nearby high elevation reservoirs sites identified as ideal for pump-up hydro storage and other types of bulk energy storage projects that use private money to interact in the wholesale energy supply space.

VSI does not object to non-exempt utilities becoming a partner in these projects but does contest the assumed common sense of enabling these utilities to source energy supplies with their regulated pricing formats that ignore subsidies in order to expand public charging networks.

VSI believes that non-exempt utilities must open up space for change, specifically, by engaging in a feasibility study exploring the opportunities for merchant pumped hydro contestation and resistance to the status quo of 'acceptable public subsidy practices' for EV fuel pricing.

Certainly, in order to rapidly accelerate the adaptation of EV's BC Hydro needs to allow for a radical reorientation of how it approaches supplying and financing energy for EV fueling and charging station development, which means BC Hydro can no longer remain silent on the issue of proposed competing merchant pumped hydro plants and their capability to advance innovation that would cost-effectively secure alternative clean and reliable resources of energy. The BCUC needs also to ensure the proposed feasibility FEED study for both JOR and Britannia Mines storage projects considers the necessity of securing legal access to municipal solid and liquid wastes, as well as to review the 'common sense criteria' behind the California Hydrogen EV station program.

With respect to recommending to amend the GGRR's to support merchant pumped hydro, the BCUC should consider to recommend use of baseload that is 'carbon controlled' and not 'carbon reduced'.

A carbon-controlled pumped storage also dictates that the overall design supports its rapid transition to become a 'net negative carbon system' that absorbs more carbon than is being produced and thereby also ensures that resulting infrastructure for EV energy supply is 100 % clean and is not a threat to the climate or to human health

Carbon-controlled merchant pumped hydro also is not just about securing clean electricity or hydrogen without paying a carbon tax, nor is it just about taking an ethical stand of public power v. private, it's also about engaging in a two-way process of negotiation and construction without top-down decision-making and with more democratization that allows communities to set up and produce their own energy and to sell any excess back to the grid or to a private bulk energy storage plant (an idea that also is potentially useful/profitable to BC Hydro for a grid access fee or, for a 'net metering' distribution-to H2 fee)

VSI is not asking for radical change that would produce insecurities that are potentially destabilizing to the financial survival/profitability of non-exempt or exempt utilities where maintaining the status quo become more important than the innovations and long term survival of a clearly competitive merchant pumped hydro business model that requires all entities working together to affect change, albeit with rearrangement of the fundamental inequality that denies private access to municipal wastes-to-energy resources.

The proposed feasibility study will make clear what an alternative vision of EV energy security might look like, to reimagine the intermittent/variable renewable energy-IPP market and thereby remove obstacles to the possibilities of identified new markets to flourish, including with carbon-controlled fossil fuel production to support pumped storage baseload.

It is not healthy for non-exempt utilities to be the sole focus or the primary referant of EV energy security or pricing

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