

May 3, 2019

British Columbia Utilities Commission
Suite 410, 900 Howe Street
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Attention: Patrick Wruck, Commission Secretary

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Dear Mr. Wruck:

Inquiry into the Regulation of Electric Vehicle Charging Services (Inquiry) – Phase 2 - Supplementary Submissions

We are legal counsel to ChargePoint in this matter and write on its behalf. ChargePoint appreciates the opportunity provided to intervenors to file supplementary submissions to clarify any potential confusion arising from the position of the Minister of Energy, Mines and Petroleum Resources (MEMPR).

ChargePoint's core submission is not affected by MEMPR's clarification. ChargePoint understood MEMPR's position to be that it intended to pass regulation to support non-exempt utility EV charging investments, whereas it is now clear that is only one of several options. Regardless, in ChargePoint's view more investment certainty for non-exempt utilities would be helpful. As both ChargePoint's Final and Reply Arguments on the Revised Scope explained, either Commission processes or legislative change can do so.

ChargePoint's further elaboration was that relying on an amendment to the prescribed undertakings of the *Greenhouse Gas Reduction Regulation (GGRR)* risks losing the benefit of the Commission's unique qualifications in this sphere. That concern remains.

In conclusion, ChargePoint supports improved investment certainty for non-exempt utilities, whether through Commission processes or government legislation. ChargePoint advises against a *GGRR* amendment to allow for EV charging services as a prescribed undertaking, as it views other options as having more flexibility to retain the Commission's oversight role. ChargePoint continues to view oversight as important for the developing EV Charging market. Please contact the undersigned if you have any questions.

Yours very truly,



Matthew D. Keen

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