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British Columbia Utilities Commission
Suite 410, 900 Howe Street
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**Attention: Mr. Patrick Wruck, Commission Secretary and Manager,
Regulatory Services**

Dear Sirs/Mesdames:

**Re: FortisBC Inc. (“FBC”) Rate Design and Rates for Electric Vehicle Direct Current
Fast Charging Service Application – Supplemental Argument**

FBC files this Supplemental Argument in accordance with Order G-90-21, dated March 23, 2021, which requested that participants address the following question:

The Panel understands the nature of providing public EV charging service and the limitations of administering refunds or collections on an individual user basis if the approved interim rate differs from permanent rates. However, the Panel requests FBC and interveners to provide supplemental arguments on the following:

1. Should the BCUC direct the variance, if any, between the interim and permanent rates be recovered, or refunded as the case may be, in the permanent rates for customers of FBC’s EV charging service?
 - a. If so, what are the implications of doing so.
 - b. If not, why not.

As noted by the Panel, due to the nature of the service, FBC will not have the ability to track users of the charging service and charge or refund customers on a retroactive basis once a permanent rate is determined.

As shown in the table below, the revenue difference between the interim rate of \$0.30/min and the proposed rate of \$0.26/min for the 50 kW stations from 2018 to 2020 is approximately \$8 thousand. There is no corresponding revenue difference for the 100 kW stations as there were no



100 kW stations in operation from 2018 to 2020. Note that the revenue for 2021 is not on the record in this proceeding.

<u>Interim EV Calculation</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>Total</u>	<u>Exhibit</u>
Interim EV Revenue	(4)	(24)	(32)	(60)	B-7, BCUC IR1 15.2
Proposed EV Revenue ¹	(3)	(21)	(28)	(52)	
Difference (\$000)	(0)	(3)	(4)	(8)	

Even taking into account the variance in 2021 up to the time of a BCUC decision, FBC does not expect the total variance to be material enough to change the proposed 10-year levelized rate, when rounded to the nearest cent per minute.

Given the amount of the variance, FBC submits that no action need be taken. However, if the BCUC would like to refund the difference to EV customers (rather than to all customers), FBC would suggest that the variance be returned to customers over one year by way of a temporary rate rider that would reduce the 50 kW station rate. Compared to alternatives that would spread the credit over a longer period of time, a one-year rate rider is more likely to reach the drivers who were served under the interim rate.

FBC would need to calculate the rate rider in its compliance filing based on the variance between interim and final rates up to the time of the Decision. Based on estimated charging times for 2021 and 2022,² a 1 cent per minute reduction to the 50 kW charging station rate would return approximately \$10,000 to EV customers over a year. Due to the nature of EV billing, while the rate rider would appear on the tariff sheets, it would not be visible to the customer as it would be embedded in the rate at the charging station.

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP

[Original signed by]

Christopher Bystrom*

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¹ Interim EV revenue recalculated based on proposed rate.

² Exhibit B-16, Attachment 20.5A, p. 6, l. 11.