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April 8, 2021

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

By Web Posting

Dear Sir:

Re: FortisBC Inc. Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service Application, BCUC Project No. 1598940
BCSEA-VEVA Supplemental Argument

This is supplemental argument of the interveners B.C. Sustainable Energy Association and Vancouver Electric Vehicle Association, pursuant to Order G-90-21.¹

In its letter of March 23, 2021, the describes the request for supplemental arguments as follows:

“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.”

FBC filed its supplemental argument on April 6, 2021.² FBC estimates that 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 \$8,000.³ FBC submits that no action need be taken, given the (small) amount of the variance. Alternatively, FBC suggests a one-year

¹ Exhibit A-15.

² https://www.bcuc.com/Documents/Arguments/2021/DOC_61990_2021-04-06-FBC-Supplemental-Argument.pdf.

³ FBC says that there is no revenue variance for 100 kW stations because none was in operation from 2018 to 2020.

temporary (negative) rate rider that would reduce the 50 kW station rate by 1 cent/minute.⁴ FBC estimates this would return approximately \$10,000 to FBC DCFC customers (EV drivers) over one year.

BCSEA-VEVA submit that no action is required. The variance is very small. Changing the interim rate to a new final rate in one step would be simpler to communicate to EV drivers than changing the rate again twice. That said, BCSEA-VEVA are not opposed to a temporary rate rider.

All the above is respectfully submitted.

Yours truly,

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⁴ Due to the nature of the DCFC billing system, the rate rider itself would not be visible to EV drivers when they use the DCFC service. Presumably, only the net rate (the final rate minus the rate rider) would be visible to EV drivers.