

Date Submitted: February 13, 2018

Proceeding name: BCUC Regulation of Electric Vehicle Charging Service Inquiry

Participant contact information

Organization or individual name: BC Sustainable Energy Association and Sierra Club BC

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Province: British Columbia

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For organizations only - representative contact information

Name: William J. Andrews, Barrister & Solicitor

Organization (if different from above):

City: North Vancouver

Province: British Columbia

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Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

BCSEA is a non-profit association of citizens, professionals and practitioners committed to promoting the understanding, development and adoption of sustainable energy, energy efficiency and energy conservation in British Columbia. BCSEA supports the province's transition to a lower-carbon economy. BCSEA has five

chapters across B.C. and approximately five hundred individual and corporate members. Many of BCSEA's members are ratepayers of BC Hydro or FortisBC. BCSEA represents individuals and corporations in BC who care about energy sustainability and climate change, and who want the energy they purchase and use to be sustainably produced and transmitted. Sierra Club BC (SCBC) is a non-profit organization of British Columbians from all walks of life committed to conserving the natural environment, with special reference to mitigating climate change; to educating people about environmental conservation; and to encouraging the enjoyment of nature. A key objective is to achieve an ecologically sustainable province which integrates human and economic activity, while conserving the province's wilderness and biodiversity values. SCBC has over 30,000 supporters across the province. Many of SCBC's supporters are ratepayers of BC Hydro and FortisBC.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

Members of BCSCA and SCBC are ratepayers of BC Hydro and FortisBC. In addition, many members of BCSEA and SCBC own or have an interest in owning an electric vehicle or in using an EV such as an electric bus when they become available. BCSEA and SCBC's interests in this proceeding are as non-profit public interest environmental and energy policy organizations, and as representatives of their members' interests as ratepayers. BCSEA and SCBC have a strong interest in fostering the development of electric vehicle charging infrastructure in B.C. They see EV charging infrastructure as a crucial component of the transition from fossil fuel usage to vehicles powered by clean and renewable electricity, which they see as one important component of reducing GHG emissions in B.C. BCSEA and SCBC are quite familiar with the public utility regulation regime in B.C. They have been aware of the regulatory challenges faced by the nascent EV charging sector. For example, they raised EV charging regulatory issues with BC Hydro during the stakeholder consultation regarding the first phase of BC Hydro's rate design application (now completed). BCSEA and SCBC have participated in various BCUC proceedings in which issues similar to the EV charging issues have arisen, such as the Commission's inquiry into alternative energy services (natural monopoly v. competitive environments), the code of conduct/transfer pricing principles proceedings (prevention of cross-subsidization where a regulated public utility or its affiliate is involved in a non-core market), and cost of service/rate design proceedings. BCSEA and SCBC serve on FortisBC's Resource Planning Advisory Group. BCSEA and SCBC also serve on BC Hydro's stakeholder advisory group regarding DSM and on BC Hydro's Technical Advisory Committee regarding the Integrated Resource Plan. In addition, BCSEA and SCBC served on the Utilities' Conservation Potential Review Technical Advisory Committee.

Please list the key issues you intend to address in the proceeding:

The issues BCSEA-SCBC intend to pursue during the proceeding include: • the scope and focus of the inquiry, • whether and if so how the provision of EV charging service to EV drivers should be regulated by the Commission under the UCA -- should providers of EV charging service be exempted from the definition of "public utility"?, • consideration of the similarities and differences between Level 1, Level 2 and Level 3 charging stations, in terms of whether and if so how economic regulation should occur, • the role of existing regulated public utilities, such as BC Hydro and FortisBC Inc., in providing, investing in or operating EV charging stations, • whether existing rate schedules (particularly with respect to demand charges) are suitable for Level 2 and Level 3 charging stations, and whether innovative approaches should be considered, • whether there is an 'uneven playing field' for the provision of EV charging services due to the existing statutory exemption of municipalities and employers providing energy to employees from the definition of public utility, • whether there is a need for some type of response by the regulated electric utilities to facilitate the adoption of EV charging service in multiple-unit residential buildings, owner occupied or rental, and • other issues to be determined.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes

If yes, please provide your username: BCSEA-SCBC