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Proceeding name: BCUC Regulation of Electric Vehicle Charging Service Inquiry

Are you currently registered as an intervener or interested party: No

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Comment:

I have been the owner of a Chevy Volt PHEV for approximately 5.5 years. To date I have driven almost 149,000 km in that vehicle, with ~98,000 km fueled by electricity and ~51,000 km fueled by gasoline. I have utilized charging stations all over southern BC between Vancouver Island and East Kootenay. The most pressing issue to me is the payment structure employed by EV charging stations. It's my understanding that only "public utilities" are permitted to bill by the kWh, and as such the only charging stations that bill by actual electricity consumed are the DC Fast Chargers since they are installed in partnership with BC Hydro. Other stations are limited to charging by the hour or charging for free. The issue with charging by the hour is that it does not treat all EV drivers equally. The charging rate for EVs can differ substantially, and the rates are skewed such that they usually favor the more expensive EVs. My Chevy Volt has a maximum charge rate of 3.3 kW, but for technical reasons is capped at 3.1 kW when charging from 208V. (as is commonly found at commercial establishments) EVs from similar-tier brands like Ford, Hyundai, and Nissan have similar specifications. Higher-tier EV brands like Tesla, Mercedes, and BMW usually have maximum charge rates of 6.6 or 10 kW. As such they can charge at double or triple the rate of the lower-tier EVs in the same span of time. If charging is billed by the hour than this has the effect of penalizing those lower-tier EVs. I own a PHEV so I have the choice of burning gas, but pure EVs don't have that option and are at the mercy of the rates set on the stations available to them. Under residential electricity prices it costs me approximately \$1 to charge my Chevy Volt from empty to full over the span of 3 hours 45 minutes in my own driveway. Assuming a charging station that bills \$2 per hour, that equates to \$8 for an equivalent fillup. At that price it is more economical for me to burn gas, but as I mentioned not everyone has that choice. (The electricity/gas break-even point for me is \$4 for a charge) However, the \$2 /hour rate is more reasonable when applied to a Tesla as it can draw \$0.80 - \$1.60 worth of electricity per hour (depending on configuration) I believe the solution is to relax the rules surrounding the resale of electricity for EV charging to enable billing per kWh. Requiring every charging station owner/operator to register as a public utility would be too onerous. Alternatively it might be possible to register the handful of charging station networks in use in BC, i.e. ChargePoint, Flo, and Greenlots Regulation is still required with regards to pricing. The few DCFC stations that do charge by the kWh average about 35

cents /kWh which I believe is roughly 3x the small general service rate for BC Hydro. Perhaps a limit of 3x small general service rate for DC Fast Chargers and a limit of 2x small general service rate for Level 2 AC charging stations.