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February 23, 2018

VIA MAIL AND EMAIL

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

Dear Mr. Wruck:

Re: British Columbia Utilities Commission (the Commission) – An Inquiry into the Regulation of Electric Vehicle Charging Service – Project Number 1598941

We are counsel to Toronto Hydro-Electric System Limited (**Toronto Hydro**). Please find enclosed Toronto Hydro's completed Request to Intervene Form and informational document for the above-noted proceeding, filed in accordance with Rules 9.01, 9.04, and 9.05 of the Commission's *Rules of Practice and Procedure*.

Toronto Hydro further respectfully requests that the Commission extend the deadline for registered interveners to file written evidence until Friday, March 16, 2018.

Yours very truly,

Lisa (Elisabeth) DeMarco

Encl.

Request to Intervene

In accordance with the Commission's **Rules of Practice and Procedure** (http://www.bcuc.com/Documents/Participant-Info/G_1_16_BCUC_Rules_of_Practice_and_Procedure.pdf), a Request to Intervene form must be received by the Commission by the deadline included in the proceeding's regulatory timetable. Please complete the form below.

Proceeding name*

BCUC Regulation of Electric Vehicle Charging Service Inquiry

Participant contact information

Organization or individual name*

Toronto Hydro-Electric System Limited

City*

Toronto

Province*

Ontario

Email

regulatoryaffairs@torontohydro.com

Phone number

416-542-7834

For organizations only - representative contact information

Name

Lisa (Elisabeth) DeMarco; Jonathan McGillivray

Organization (if different from above)

DeMarco Allan LLP

City

Toronto

Province

Ontario

Email

lisa@demarcoallan.com; jonathan@demarcoallan.com

Phone number

647-991-1190; 647-208-2677

Also representing (if applicable)

Additional information

Please state your reasons for intervening in this proceeding.*

Toronto Hydro intends to participate in and contribute to the Inquiry into the Regulation of Electric Vehicle ("EV") Charging Service (the "Inquiry") given that the Inquiry outcomes may directly or sufficiently affect utilities that intend to participate in EV charging services in their respective jurisdictions. Toronto Hydro has a clear track record of being a leader in EV charging pilot research, and constructive approaches to associated changes in markets and monopoly activities, including addressing ratemaking and other regulatory policy considerations that result from the evolving definition of a utility. Toronto Hydro has significant experience and expertise in electricity distribution, technical requirements, and regulatory issues as well as opportunities associated with developing, implementing, and researching customer behaviours, and operating EV charging technology and services. As such, we have relevant information and a keen interest in the issues being addressed in this Inquiry. More specifically, EV adoption continues to grow in Toronto due to promotion by government policy, as well as environmental and cost factors. Toronto Hydro is showing its support by providing outreach, education, standards and planning, and by enabling infrastructure EV initiative projects including the following:

- workplace charging,
- smart charging and controls to manage grid impact and effective integration,
- curbside EV charging pilot to understand the demand, and parking issues, to maximize usage,
- streetlight charging project, leveraging poles to serve "under-served" areas,
- customer behaviour research
- improving accessibility to test new metering solutions for multi-unit residential buildings and on-street charging, and
- forecasting load impacts to help identify areas of EV growth, and where investments may be required to manage/upgrade systems.

Toronto Hydro intends to participate actively in, and contribute, to the Commission's consideration of regulatory issues and opportunities associated with EV charging services. Toronto Hydro's Chief Executive Officer was recently awarded the Canadian Electricity Association's ("CEA's") Award for Individual Leadership on Sustainability, in part because of Toronto Hydro's leadership on issues including EV charging and electrification of transportation.

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.*

Toronto Hydro may be both directly and sufficiently affected by the Commission's decision in the Inquiry given that the Inquiry is likely to directly or sufficiently affect Toronto Hydro and other utilities and distribution companies intending to develop and implement EV charging services. Toronto Hydro is of the view that the Commission's report in the Inquiry will be relevant to all utilities and entities wishing to accelerate reduced greenhouse gas emissions through electrification of the transportation sector and the sustainable operation and maintenance of utility assets to facilitate a smooth transition to a lower carbon economy.

In addition, Toronto Hydro has EV charging service and regulated electricity distributor experience, information, and expertise that could be directly relevant to the Inquiry and the Commission in discharging its duties and decision-making obligations pursuant to sections 82 to 84 of the Utilities Commission Act, R.S.B.C. 1996, c.473.

Toronto Hydro intends to contribute its experience, expertise, and market information related to electrification of the transportation sector as a climate change strategy, competition in EV charging services, and just and reasonable rates to the Commission's consideration of the regulation of EV charging service. Toronto Hydro brings an important perspective on how the matters covered by the Inquiry are likely to impact and interact with electrical distribution system necessary to support EV charging services, as well as other urban infrastructure improvements and trends toward urban land use intensification and electrification of transportation. Toronto Hydro is the owner and operator of approximately \$4.1 billion of capital assets comprised primarily of an electricity distribution system that delivers electricity, at just and reasonable rates, to approximately 761,000 customers located in the City of Toronto. It is also a leader in sustainability and the role that utilities can play in addressing climate change.

Please list the key issues you intend to address in the proceeding.*

Toronto Hydro has expertise and data and an interest in all issues identified by the Commission in the Inquiry communication dated January 12, 2018, including:

1. Do EV charging stations operate in a competitive environment in BC or are they a natural monopoly service?
2. Are the customers of EV charging stations captive or do they have a choice?
3. Should the Commission regulate the services provided by EV charging stations? What are benefits and detriments to such regulation?
4. Should the rate design of EV charging stations be established under a public utility's traditional cost of service model or some other model? And within that context, what are the customer pricing options (e.g. energy-based rate vs. time-based rate)?
5. Should the EV charging station service rate be based on a public utility's existing wholesale or commercial retail rate or some other rate?
6. Should public utilities include EV charging stations in their regulated rate base or through a separate non-regulated entity?
7. If public utilities provide EV charging services within their regulated business, is there a risk of cross subsidization from other rate classes to support this new service and if so, is the proposed rate design potentially unduly discriminatory?
8. Any other matters that may assist in the effective and efficient review of the Inquiry?

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

Yes, Toronto Hydro hopes to be a full and active participant in order to assist the Commission.

Do you intend to request PACA funding? This does not impact your ability to participate.*

Toronto Hydro does not intend to request PACA funding at this time and this does not impact its ability to participate.

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

Toronto Hydro has not web-registered as an intervener or an interested party before the Commission in the past 12 months. It has, however, been an active and regulated distribution company appearing before other Canadian energy regulators within the last 12 months.

If yes, please provide your username

Submit

* Required field

You may print a copy of this page before submitting.

Print

To submit your Request to Intervene by email, mail or fax please click print and send the completed form to the following address:

Mail:

Commission Secretary

British Columbia Utilities Commission

900 Howe Street
Suite 410
Vancouver, BC V6Z 2N3

Fax: (604) 660-1102

Email: commission.secretary@bcuc.com (mailto:commission.secretary@bcuc.com)

The BC Utilities Commission is authorized to collect and publish a person or organization's personal information when they participate in a matter before the Commission under sections 26(c) and 33.1(r)(ii) and (iii) of the Freedom of Information and Protection of Privacy Act (FIPPA). Subject to FIPPA, all documents filed in respect to an application will be placed on the public record.

● ● ● **British Columbia Utilities Commission (/about/contact-us.html)**

Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

Phone: 604.660.4700 (tel:604.660.4700)

BC Toll-free: 1.800.663.1385 (tel:1.800.663.1385)

Fax: 604.660.1102 (tel:604.660.1102)

Email: commission.secretary@bcuc.com (mailto:commission.secretary@bcuc.com)

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BRITISH COLUMBIA UTILITIES COMMISSION

IN THE MATTER OF the *Utilities Commission Act*, R.S.B.C.,
c.473;

AND IN THE MATTER OF Order G-10-18 establishing an inquiry
into the regulation of electric vehicle charging service by the
British Columbia Utilities Commission.

**INFORMATIONAL DOCUMENT IN SUPPORT OF
TORONTO HYDRO-ELECTRIC SYSTEM LIMITED
REQUEST TO INTERVENE IN PROJECT NO. 1598941**

Friday, February 23, 2018

Informational Document in Support of Toronto Hydro-Electric System Limited Request to Intervene in Project No. 1598941

1. Toronto Hydro-Electric System Limited (**Toronto Hydro**) owns and operates the electricity distribution system for Canada's largest city. A leader in conservation and demand management, Toronto Hydro distributes approximately 19% of the electricity consumed in Ontario.
2. Toronto Hydro is a corporation incorporated under the *Business Corporations Act*, R.S.O. 1990, c. B.17 and is licenced by the Ontario Energy Board under licence number ED-2002-0497 to distribute electricity in the City of Toronto. Toronto Hydro owns and operates approximately \$4.1 billion of capital assets comprised primarily of an electricity distribution system that delivers electricity to approximately 761,000 customers located in the City of Toronto.
3. Toronto Hydro has applied for intervener status in the British Columbia Utilities Commission's (**Commission's**) Inquiry into the Regulation of Electric Vehicle Charging Service established by Order G-10-18 (the **Inquiry**) and has completed the Request to Intervene Form pursuant to Rules 9.01, 9.04, and 9.05 of the Commission's *Rules of Practice and Procedure* (the **Rules**). This informational document is filed, in support of Toronto Hydro's request to intervene in the Inquiry, pursuant to Rule 9.05(b) of the Rules.

Mandate and Objectives

4. Toronto Hydro serves the largest city in Canada and distributes approximately 19% of the electricity consumed in the province of Ontario.

Membership, Membership Processes, and Constituency

5. Toronto Hydro is a wholly owned subsidiary of Toronto Hydro Corporation, of which the City of Toronto is the sole shareholder. Toronto Hydro is governed by a board of directors, the members of which may be found here: <https://www.torontohydro.com/sites/corporate/AboutUs/Pages/BoardofDirectors.aspx>. While Toronto Hydro is accountable to its valued customers, it does not have a "membership" or a "membership process".

Programs and Activities

6. In October 2017, Toronto City Council unanimously approved a residential on-street EV charging station pilot project to enable Toronto Hydro to utilize electrical and street light poles

at two (2) locations in each of Wards 19, 30 and 32, for up to twelve (12) EVs as well as at one location opposite Toronto Hydro's facilities at 500 Commissioners St. (Ward 30) to serve two (2) EVs for a one-year period.

7. Toronto Hydro supports the City of Toronto's goals of reducing greenhouse gas emissions by 30% by 2020 and 80% by 2050 by reducing its own GHG emissions associated with its fleet, facilities, line losses, releases of sulphur hexafluoride (SF₆) gases, and facilitating the transformation to a carbon-free city through the electrification of activities and equipment currently powered by fossil fuels.

Authorized Representatives

8. Toronto Hydro hereby designates the following authorized representatives and requests that further communications with respect to this proceeding be sent to the following:

Toronto Hydro-Electric System Limited

14 Carlton Street
Toronto, ON M5B 1K5

Attention: Andrew J. Sasso
Telephone: 416-542-7834
Email: regulatoryaffairs@torontohydro.com

AND TO ITS COUNSEL

DeMarco Allan LLP

5 Hazelton Avenue, Suite 200
Toronto, ON M5R 2E1

Attention: Lisa (Elisabeth) DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@demarcoallan.com

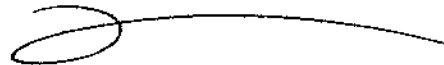
Attention: Jonathan McGillivray
Tel: 647-208-2677
Facsimile: 1-888-734-9459
Email: jonathan@demarcoallan.com

Other Information

9. Toronto Hydro is a leader in the electricity distribution sector and has received recent accolades, including:

- Award for Individual Leadership on Sustainability (CEA)
- Recognition as a Sustainable Electricity Company (CEA)
- President's Award of Excellence for Employee Safety (CEA)
- Canada's Safest Employer Gold Safety Award (Canadian Occupational Safety)

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
23rd day of February, 2018.



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Toronto Hydro