

Date Submitted: March 05, 2018

Proceeding name: BCUC Regulation of Electric Vehicle Charging Service Inquiry

Participant contact information

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For organizations only - representative contact information

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Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

The outcomes of this inquiry may have an impact on the regulatory treatment in other jurisdictions within Canada. As one of Canada's largest electricity distribution companies, Alectra is very interested in the dialogue that may occur in the Utilities Commission's proceeding. Electric Vehicle adoption continues to grow in Ontario, and Alectra means to ensure that the infrastructure that consumers need and value is available when and where they need it.

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:

Alectra was formed on January 31, 2017, following the merger of Enersource Hydro Mississauga Inc. (“Enersource”), Horizon Utilities Corporation (“Horizon Utilities”) and PowerStream Inc. (“PowerStream”). Alectra’s subsequent acquisition of Hydro One Brampton Networks Inc. (“HOBNI” or “Brampton”) on February 28, 2017 completed the transaction. Alectra serves approximately 990,000 customers across an 1,800 sq. km service territory spanning 15 communities across Ontario. Alectra owns, maintains and operates approximately 6,642 km of overhead primary distribution feeders and 13,210 km of underground primary distribution circuits, as well as 339 – 4.16kV, 47 - 8.32 kV, 754 - 13.8 kV, 292 - 27.6 kV, and 132 - 44kV feeders within its service territory. Alectra may be affected by this Decision as other Regulatory agencies across the Country consider the same or similar issues. Alectra is of the view that the Commission's outcomes will be relevant to all utilities looking to accelerate the electrification of transportation towards the pursuit of a lower carbon economy. Alectra wishes to lend its experience or expertise to the Commission where it may be helpful to do so.

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

Alectra has an interest in all of the issues identified by the Commission in this proceeding. 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?

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: No

Do you intend to request PACA funding? This does not impact your ability to participate: No

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: No

If yes, please provide your username: