

Date Submitted: April 19, 2018

Proceeding name: BCUC Regulation of Electric Vehicle Charging Service Inquiry

Are you currently registered as an intervener or interested party: Yes, Interested Party

Name (first and last): Marie Crawford (UBCM)

City: Richmond

Province: British Columbia

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Comment:

UBCM is the association that represents the interests of all local governments in BC. Our members have made climate action a priority, have endorsed resolutions related to reducing GHG emissions and more specifically adopted policy related to EV charging infrastructure.

April 17, 2018

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

Dear Mr. Wruck:

**Re: BCUC Inquiry into the Regulation of Electric Vehicle Charging
Service Project # 1598941**

As the association representing the interests of all local governments in BC, the Union of BC Municipalities (UBCM) registered as an interested party to the above inquiry.

Communities throughout BC have made climate action a priority. As a result, nearly 100% of BC local governments have signed on to the Province's Climate Action Charter, committing to the goals of being carbon neutral and creating complete, compact and energy-efficient communities.

Specific actions taken by local governments include:

- converting or purchasing electric vehicles for their own fleets; and
- supporting/facilitating EV charging infrastructure within their communities

Our membership specifically adopted two resolutions at the 2017 UBCM Convention sponsored by Metro Vancouver. Those resolutions are attached for reference specifically addressing EV charging within strata complexes.

Thank you for the opportunity to provide input into this inquiry.

Kind Regards,



Wendy Booth
UBCM President

Att – 2017 Resolutions – B116 and B132

2017 B116 Resale of Electricity for Electric Vehicle Charging

Metro Vancouver

Whereas the BC Climate Leadership Plan has a stated goal of supporting vehicle charging development for zero emission vehicles to reduce greenhouse gas emissions, and lack of access to electric vehicle (EV) charging, especially in stratified dwellings, is an impediment to EV uptake;

And whereas exclusions from the definition of a 'public utility' under the BC *Utilities Commission Act* include a person providing a service or commodity to tenants, but are silent regarding strata corporations and its resident members;

And whereas processes for exemptions from provisions of the BC *Utilities Commission Act* discourage small-scale for-profit resale of electricity for the purpose of electric vehicle charging:

Therefore be it resolved that the Province of British Columbia amend the *Utilities Commission Act*, before the end of 2018, to specifically exclude from the definition of a 'public utility' a strata corporation providing services to its members, and exclude from the definition of a 'public utility' a small-scale reseller of electricity at profit for the purpose of electric vehicle charging in public and private settings; and, in both of the aforementioned cases, exempt the reporting requirements currently set out in Section 71 of the Act.

Convention Decision: Endorsed

Provincial Response

Ministry of Energy, Mines & Petroleum Resources

As part of the PanCanadian Framework on Clean Growth and Climate Change, Canada, provinces and territories committed to developing a Zero Emission Vehicle Strategy by 2018. Under this strategy, infrastructure will be an important component of the strategy. Many provinces have identified the resale of electricity as a barrier to developing the charging infrastructure.

Ministry staff are undertaking work on this issue, to identify the types of legislative and/or regulatory change that would be required if government were to proceed to enable an exemption from the public utility definition or changing the definition of a public utility to exclude the reselling of electricity for specific purposes.

Work to date has also included discussions with staff from the BC Utilities Commission and regulated utilities.

Resolutions Committee Comments

The Resolutions Committee advises that the UBCM membership has not previously considered a resolution calling on the provincial government to amend the Utilities Commission Act to exempt from the definition of "public utility" and associated reporting requirements:

- a strata corporation providing electricity and electric vehicle charging facilities as a service to its members; or*
- a small scale for-profit reseller of electricity for the purpose of charging electric vehicles.*

See also resolution B132.

2017 B132 Electric Vehicle Charging in Strata Buildings

Metro Vancouver

Whereas the BC Climate Leadership Plan has a stated goal of supporting vehicle charging development for zero emission vehicles to reduce greenhouse gas emissions, and lack of access to electric vehicle (EV) charging is an impediment to EV uptake;

And whereas a significant and growing proportion of British Columbia residents live in multifamily dwellings, most of which are stratified;

And whereas requirements for approval by a strata corporation under the BC *Strata Property Act* for alteration of common property represent a significant barrier to installing and accessing means of charging in stratified buildings:

Therefore be it resolved that the Province of British Columbia amend the BC *Strata Property Act*, before the end of 2018, such that strata councils and strata corporations must accommodate reasonable requests from residents, for the purpose of electric vehicle charging, to access existing or install new powered outlets and/or electric vehicle charging infrastructure, where the assignment of associated costs are to be determined by the strata council and/or the strata corporation.

Convention Decision: Endorsed

Provincial Response

Ministry of Municipal Affairs & Housing

Government is interested in enabling strata residents to access electric vehicle charging in strata properties. At the same time, it is important to recognize the unique nature of each property and the right of strata residents to govern themselves.

A report by the Condominium Home Owners Association of BC highlights both the opportunities and the practical and site-specific challenges of installing electric vehicle charging in existing strata corporations.

<http://www.choa.bc.ca/wp-content/uploads/EVCS-Report.pdf>

Rather than setting the stage for further conflict over what constitutes a “reasonable request”, ministry staff are working with strata partners and the Ministry of Environment and Climate Change Strategy to identify and remove regulatory barriers to strata corporation approval of installations. Strata property legislation is regularly reviewed and updated to ensure it is meeting the needs of strata corporations and owners.

Resolutions Committee Comments

The Resolutions Committee advises that the UBCM membership has not previously considered a resolution calling for provincial amendments to the Strata Property Act to require that strata councils and strata corporations accommodate “reasonable requests from residents, for the purpose of electric vehicle charging, to access existing or install new powered outlets or electric vehicle charging infrastructure,” with assignment of associated costs to be determined by the strata council or corporation.

See also resolution B116.