



May 3, 2018

Sent via email/eFile

<b>BCUC REGULATION OF ELECTRIC VEHICLE CHARGING SERVICE INQUIRY EXHIBIT A-11</b>
--

Mr. Donald Flintoff  
don\_flintoff@hotmail.com

**Re: British Columbia Utilities Commission – An Inquiry into the Regulation of Electric Vehicle Charging Service – Project Number 1598941 – Information Request No. 1**

Dear Mr. Flintoff:

Further to your March 2 and March 16, 2018 filings of written evidence with respect to the above-noted Inquiry, enclosed please find British Columbia Utilities Commission (BCUC) Information Request No. 1. In accordance with the regulatory timetable please file your responses on or before Wednesday, June 6, 2018.

The BCUC's Rules of Practice and Procedure (Rules) set out in Order G-1-16 provide guidance and establish requirements for participants in BCUC proceedings. Subject to section 14 of the Rules, all parties that receive an information request must provide full and adequate response to each question.

The BCUC's Rules of Practice and Procedure can be viewed here:  
<https://www.ordersdecisions.bcuc.com/bcuc/orders/en/127520/1/document.do>

If you have any questions regarding the information request process, please contact Commission Secretary.

Sincerely,

*Original signed by:*

Patrick Wruck  
Commission Secretary

/dg  
Enclosure



**British Columbia Utilities Commission  
An Inquiry into the Regulation of Electric Vehicle Charging Service**

**INFORMATION REQUEST NO. 1 TO DONALD FLINTOFF**

---

**A. BASIS FOR EV CHARGING SERVICE REGULATION EXEMPTION**

- 1.0 Reference: Exhibit C4-2, p. 6; Exhibit C6-2, p. 5  
The British Columbia Utilities Commission (BCUC) Thermal Energy System Guidelines (TES Guidelines), p. 7  
Ministerial exemption**

On page 6 of Exhibit C4-2, Donald Flintoff states:

Clearly, the operators of the DCFC charging stations are a public utility. Through the Commission, the operators of DCFC stations may be able to seek a ministerial exemption from regulation which can be withheld/cancelled on complaint. Any exemptions should expire after five years and another inquiry should be held to determine if the exemptions are working in the public interest. Further discussion on this matter assumes the Commission can obtain the necessary exemption from the Ministry.

On May 19, 2016 by Order G-71-16, the BCUC granted Bakerview EcoDairy an exemption from Part 3 of the *Utilities Commission Act* (UCA), except sections 25, 38, 42, 43, 44 and 49.<sup>1</sup>

- 1.1 Flintoff submits that any exemptions should expire after five years and another inquiry should be held to determine if the exemptions are working in the public interest. Would it be more practical and regulatory efficient for the BCUC to continue the exemption and initiate another inquiry after a period of time (e.g. five years) to determine if the exemptions should continue? Why or why not?
- 1.2 In Flintoff's view, if the BCUC were to recommend a class of cases exemption to government in relation to EV charging service, what factors should be considered in developing the classes? Further, what sections of the UCA, in Flintoff's view, should EV charging service be exempt from?
- 1.3 Does Flintoff have a view on what the classes could be (e.g. based on different levels of EV charging equipment, charging station geographic locations, type of dwelling, owner/operator structure, some combination of the above, or others)? If yes, please describe.

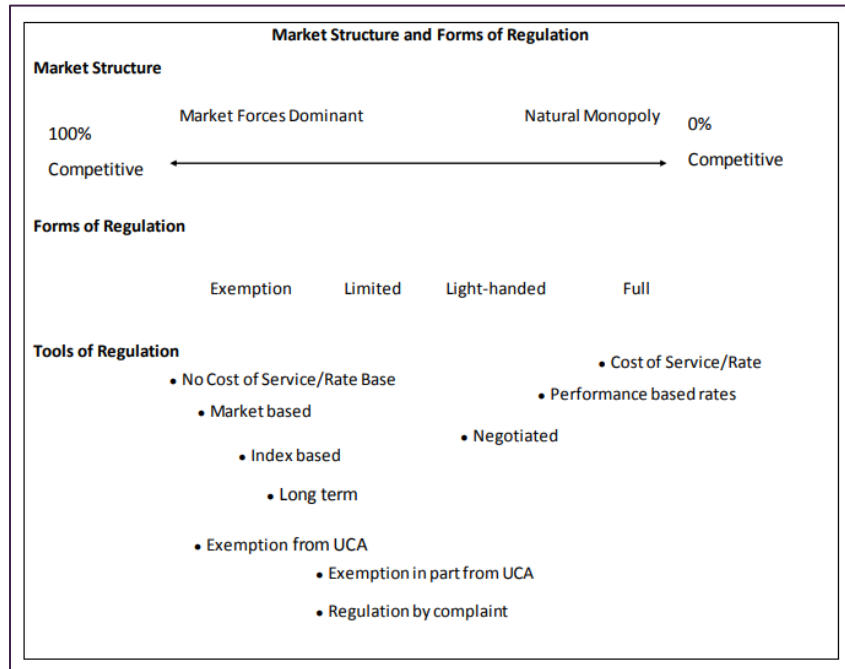
---

<sup>1</sup> [http://www.bcuc.com/Documents/Proceedings/2016/DOC\\_46352\\_05-19-2016\\_Bakerview-Exemption-Approved\\_G-71-16.pdf](http://www.bcuc.com/Documents/Proceedings/2016/DOC_46352_05-19-2016_Bakerview-Exemption-Approved_G-71-16.pdf)

**2.0 Reference: The BCUC Inquiry into FortisBC Energy Inc.’s Offering of Products and Services in Alternative Energy Solutions (AES) and Other New Initiatives proceeding, Order G-231-13A with Reasons for Decision, pp. 23–24  
Proposed regulatory framework and guide for thermal energy service utilities**

On pages 23 and 24 of the Reasons for Decision attached to Order G-231-13A, the BCUC states:

The [AES] Inquiry found that the form of regulation should be determined by the market structure. The Panel agrees with this assessment. The figure below illustrates the Panel’s view of the relationship between market structure and the various tools of regulation.



The Panel in Order G-231-13A also agreed with the basic regulatory concepts outlined in the AES Inquiry Report whereby regulation should be the option of last resort and competition should always be preferred over regulation.

- 2.1 Please discuss whether the BCUC in this EV Inquiry should consider the relationship between market structure and forms/tools of regulation, as shown above in the diagram. If not, why not?
- 2.2 Suppose the BCUC uses the above diagram as a guide to determine the appropriate form of regulation. Given the market structure noted in Mr. Flintoff’s submission, what would be the corresponding form of regulation and tool of regulation? If any different, please explain in terms of the Flintoff’s view of the current market structure and the expected market structure in the next 3-5 years.

## **B. INVESTMENT DECISION**

### **3.0 Reference: Exhibit C12-2, p. 19; Exhibit C20-2, p. 8 Business model**

On page 19 of Exhibit C12-2, FortisBC Inc. (FBC) states:

FBC recommends that a new rate should be developed for electricity supply to EV charging stations, since its existing retail and wholesale rate schedules contain components, such as demand charges or high customer charges that would make them inappropriate to support the development of EV charging infrastructure in the province. The rate should reflect the unique characteristics of the service being provided.

On page 8 of Exhibit C20-2, AddÉnergie Technologies Inc. states:

The Commission can support the development of DCFC public charging by providing a demand charge-free charging rate. This approach has been used in Québec in a 5-year pilot (the Québec BR rate) and has substantially reduced some of the economic barriers to providing public DCFC charging.

3.1 Please comment on an alternative rate structures such as the Québec BR rate.

## **C. TECHNOLOGY**

### **4.0 Reference: Exhibit C4-2, p. 22 Power factor**

On pages 22 of Exhibit C4-2, Mr. Flintoff states:

Since the charging station power factor of 0.96 is only specified at full load then a power factor penalty should be applied and/or a kVAR/kVARh charge introduced in the EV charging station's rate schedule. The DCFC station should have an input power factor of not less than 0.95 through the capacity range of 0 to 100% of rated input amperes.

4.1 Please provide some background material or reference on how it is known that the EV charging station power factor of 0.96 is only specified at full load.

4.2 Please clarify the role of power factor plays when considering the potential regulation of the EV charging service market.