



May 3, 2018

Sent via eFile

BCUC REGULATION OF ELECTRIC VEHICLE CHARGING SERVICE INQUIRY EXHIBIT A-29
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Bruce Mackenzie
Bruce-Energy@shaw.ca

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

Dear Mr. Mackenzie:

Further to your March 15, 2018 filing 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 BRUCE MACKENZIE

A. BASIS FOR EV CHARGING SERVICE REGULATION EXEMPTION

**1.0 Reference: Exhibit C32-2, p. 2
Basis for regulation**

On page 2 of Exhibit C32-2, Bruce Mackenzie (MacKenzie) states:

The Commission's goal should be to apply only as much regulation as is required for safety and to avoid fraud and monopoly price gouging. The market mechanisms that regulate the current sale of gasoline should be transplanted to the sale of electricity, allowing competition for service and price to the consumer. Regulate only enough to prevent price gouging from monopolistic or anti-competitive behaviour.

1.1 Please comment on whether the principles of safety, fraud and monopoly price gouging should apply to all entities that provide EV charging services, or should regulated public utilities (e.g. BC Hydro and FBC) be subject to different criteria or treatment than third-parties (e.g. AddÉnergie, ChargePoint, or Greenlots).

1.1.1 To MacKenzie's understanding, what regulation is currently in place for the sale of gasoline, and how should that be applied to regulating the sale of electricity?

1.2 Please elaborate on price gouging. Is the concern related to how much public utilities are charging electric vehicle (EV) infrastructure site hosts, or how much EV charging stations are charging end users, or both? Please explain.

1.2.1 If MacKenzie is concerned about how much EV charging stations are charging end users, would setting a price ceiling on the resale of electricity alleviate this concern? Why or why not?

**2.0 Reference: Exhibit C32-2, p. 1
BCUC Thermal Energy System Guidelines (TES Guidelines), p. 7
Class of cases exemption**

On page 1 of Exhibit C32-2, Mackenzie states: "The Commission should be advising Government to change the Utilities Commission Act to allow strata corporations to charge for electricity by the kWh."

On page 7 of the BCUC's Thermal Energy System Guidelines (TES Guidelines), it states:

Strata Corporation TES¹: A TES owned or operated by a Strata Corporation, or the Strata Corporation's lessee, trustee, receiver or liquidator, that supplies the Strata Corporation's owners, is exempt from Part 3 of the UCA other than sections 42, 43 and 44.

¹ As defined by the *Strata Property Act* [SBC 1998].

- 2.1 The BCUC is able to grant “class-exemptions” for certain groups under section 88.3 of the *Utilities Commission Act (UCA)* to remove regulatory requirements of the UCA. Please comment on the benefits or otherwise of a class-exemption for strata. Please discuss whether the class-exemption should be full or partial, and whether it should apply to all levels of charging.
- 2.2 In Mackenzie’s view, should an exemption similar to the Strata Corporation exemption in the TES Guidelines be considered for MURBs/Strata Corporations if EV charging service were to be regulated by the BCUC? Please discuss.