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May 15, 2018

VIA EMAIL - WJANDREWS@SHAW.CA &
THACKNEY@SHAW.CA

BC Sustainable Energy Association and Sierra Club BC
c/o William J. Andrews
Barrister & Solicitor
1958 Parkside Lane
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Dear Sirs/Mesdames:


**Re: British Columbia Utilities Commission Inquiry into the Regulation of Electric
Vehicle Charging Service ~ Project No. 1598941**

We are counsel to the Commercial Energy Consumers Association of British Columbia (the "CEC"). Attached please find the CEC's Information Request on written evidence with respect to the above-noted proceeding.

If you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Yours truly,

OWEN BIRD LAW CORPORATION



Christopher P. Weafer

CPW/jj

cc: BCUC – Atten: Patrick Wruck, Commission Secretary
cc: Registered Interveners
cc: CEC

**COMMERCIAL ENERGY CONSUMERS ASSOCIATION
OF BRITISH COLUMBIA (“CEC”)**

**INFORMATION REQUEST NO. 1 TO BC SUSTAINABLE ENERGY ASSOCIATION
AND SIERRA CLUB BC (“BCSEA”)**

**British Columbia Utilities Commission – Inquiry into the Regulation of Electric Vehicle
Charging Service ~ Project No. 1598941**

May 15, 2018

1. Reference: Exhibit C6-2, Page 5

6. The Commission should approach the provision of EV charging services by BC Hydro and FBC bearing in mind the following:
- a. During the development of the EV sector in B.C., the Commission should allow BC Hydro and FBC to play an active role in developing EV charging services and infrastructure.
 - b. Particular projects or programs that may be proposed by BC Hydro or FBC should be examined by the Commission on their own merits, bearing in mind, among other things, the importance of innovation and market development.

- 1.1 Does BCSEA envisage that the public utility involvement in the EV market would be transitioned over to the competitive markets once the EV development has gained sufficient size and momentum?
- 1.2 Please explain what BCSEA means in (b) with regard to reviewing utility programs in regard to innovation and market development.
- 1.3 Does BCSEA expect the market development to eventually be non-regulated EV charging in robust market place where utility participation if any would not be public regulated utility monopoly service but competitive market service?

2. Reference: Exhibit C6-2, Page 11

BCSEA-SCBC's preliminary responses to the question of whether the Commission should regulate the provision of EV charging services are as follows:

- 1. EV charging services provided by BC Hydro or FBC should be regulated by the Commission, albeit on some form of light-handed basis.
- 2.1 Would BCSEA have any problems with a model where the public utility participation would be through non-regulated entities owned by the utilities with a program of contributions from the utilities similar to the Power Smart programs such that private sector development of charging stations can have access to the same degree of subsidy

that would be available to the public utilities, thereby creating a level playing field for private sector investment and development of the EV market?

- 2.2 Would the BCSEA see such a model as discussed above being better designed to transition to a competitive market as the competitive market develops critical mass size and a robust economic model?

3. Reference: Exhibit C6-2, Page 14

2. Given the public interest in encouraging the development of the EV sector in B.C. and the associated availability of publicly available EV charging services provided by BC Hydro and FBC as well as other entities, and the early development stage of the EV sector in B.C., BCSEA-SCBC's view is that the Commission should take a staged approach. In the first stage, while EVs and EV charging services are undergoing early rapid development, the Commission should take a purpose-oriented approach to the pricing and cost recovery of EV charging services by BC Hydro and FBC. During this first stage, the Commission should not attempt to apply the types of meticulous cost of service analysis that might be more suitable in a later stage if and when BC Hydro and FBC are providing EV charging services in a relatively mature EV market situation.

- 3.1 Would it make sense to the BCSEA that electricity for the EV sector simply be priced under existing tariffs and to the extent that there is merit in accelerating the development of EV charging that this be done through a simple contribution mechanism to the EV charging providers, particularly in the early stages of development when the greater support may be required and geographic distribution of the support will be most important?

4. Reference: Exhibit C6-2, Page 15

2. That said, before (logically and chronologically) considering separate corporate entities, whether regulated or unregulated, it would be appropriate to consider measures such as accounting treatments. Requiring BC Hydro and/or FBC to create separate corporate entities for EV charging services could be costly, time-consuming and potentially disruptive.
- 4.1 Please provide a breakdown of what the BCSEA estimates the costs of establishing an unregulated corporate entity under a public utility would be?
- 4.2 Does BCSEA expect that in the private sector is it normally costly, time-consuming and disruptive to set up a corporate entity?