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May 15, 2018

**VIA EMAIL -
DLITTLEJOHN@COMMUNITYENERGY.BC.CA**

Community Energy Association
Vancouver, BC

Attention: Mr. Dale Littlejohn

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 COMMUNITY ENERGY ASSOCIATION

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

May 15, 2018

1. Reference: Exhibit C34-2, Page 1 & 6

Utilities are valued partners of small communities across BC. Small communities need utilities to own and operate DCFC infrastructure in their jurisdictions in order to achieve community energy and emissions reduction targets and economic development. Small communities can find the capital for DCFC but need utilities for ongoing ownership and operation. The utility operation of DCFC must provide high availability and high visibility in order to achieve the community objectives leading to DCFC deployment.

Conclusion: Currently DCFC can operate in a quasi-competitive environment in larger urban centers (local governments and utilities as owner/operators). However in small communities, DCFC is currently operating as a regional monopoly for utilities given their unique cost and capability advantages.

- 1.1 If the small communities across BC can provide the capital for EV charging stations and particularly DCFC stations, why would they not own the stations?
- 1.2 If the operating costs for the charging station in the small communities require the utilities by way of operation of the DCFC infrastructure because they can subsidize the DCFC charging from all ratepayers would it be the case that a third party private sector could provide the same service in small communities if it also had access to the same subsidy as it is assumed the utility will have?

2. Reference: Exhibit C34-2, Page 9

- c. Non-utilities: Non-utility DCFC owner/operators currently have high demand charges for DCFC equipment (typically 50kWh systems) that utilities do not appear to account for in their internal costs for DCFC. If BCUC wishes to increase the diversity of owner/operators to ensure that customers are not captive, addressing the demand-charge costs could be a way to make DCFC ownership and operation more attractive to private and public sector owner/operators. We expect that this would be most applicable to large urban areas over the next decade where EV and charging density provides the volume of charge events required for a positive business case. We do not expect a positive business case for private sector DCFC owners in small communities in the immediate future.
- 2.1 If one of the Commissions roles is to protect rate payers from discriminatory practices why would the Commission exempt on group of end users of the electric system from responsibility for costs that they are causing unless it is justified such as in a time of use charge?
- 2.2 Is the objective of this suggestion just to make sure that the DCFC stations can run economically with the subsidy in the early stages while there is too little demand for the EV charging services?