

# William J. Andrews

## Barrister & Solicitor

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May 15, 2018

Iain Myrans  
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Dear Sir:

Re: BCUC Inquiry into the Regulation of Electric Vehicle Charging Service,  
Project No.1598941  
BCSEA and SCBC Information Request to Tesla Motors Canada ULC (Tesla)

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Further to your filing of written evidence in this proceeding, enclosed please find Information Request No. 1 by BC Sustainable Energy Association and Sierra Club BC to Tesla. Please file your responses in accordance with the regulatory timetable.

If you have any questions about the meaning of these information requests, please do not hesitate to contact the undersigned.

Yours truly,

William J. Andrews



Barrister & Solicitor

Encl.

REQUESTOR NAME: **BC Sustainable Energy Association and Sierra Club BC**

INFORMATION REQUEST ROUND NO: 1

TO: **Tesla Motors Canada ULC (Tesla)**

DATE: **May 15, 2018**

PROJECT NO: **1598941**

APPLICATION NAME: **British Columbia Utilities Commission Inquiry into the Regulation of Electric Vehicle Charging Service**

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**1.0 Topic: Tesla EV charging network**  
**Reference: Exhibit C28-2, Tesla Evidence,**

“Tesla customers are not captive to using Tesla chargers and may use a wide variety of charging services -- whether from Tesla or third parties.” [p.4]

- 1.1 Please discuss the extent to which drivers of EVs that are not Tesla vehicles are able (physical connection) or allowed (per Tesla policy) to use Tesla’s EV charging stations.
- 1.2 Is this expected to change in the future? If so, in what direction? Does Tesla see a future in which its EV charging services are routinely utilized by non-Tesla drivers?

**2.0 Topic: EV charging availability in B.C., make-ready service**  
**Reference: Exhibit C28-2, Tesla Evidence**

“Although third parties are developing charging networks, regulated utilities also play an important role in the deployment of EV chargers and the EV marketplace. Utilities provide electrical service to new stations, send price signals through rate designs, and can help increase customer education and awareness of EVs and charging stations. In those few situations where the competitive market is not providing an adequate supply of EV charging infrastructure (such as in remote communities and multi-unit dwellings) it may be appropriate for regulated utilities to participate more actively in the EV charging market. Unlike competitive charging companies which do not use ratepayer funds, a regulated utility that participates in the EV charging market with ratepayer funds should have their activities overseen by the Commission. Currently the three major California investor-owned utilities have active “make-ready” infrastructure programs in which the utilities own infrastructure beyond the customer’s meter, including the electrical panel and conduit. These programs are in place to deploy more level-2 charging infrastructure and require the review and approval of the California Public Utilities Commission<sup>9</sup> prior to deployment.” [p.6, underline added]

- 2.1 In addition to Tesla, what other third parties are developing EV charging networks in BC?
- 2.2 Does Tesla consider that, apart from the few situations such as in remote communities and multi-unit dwellings, there is an adequate supply of EV charging infrastructure in B.C. at the present time?
  - 2.2.1 Does this view apply to Tesla vehicles only, or does it apply to all brands of EVs?

2.3 Does Tesla support the California investor-owned utilities' "make-ready" infrastructure programs?

2.3.1 Does Tesla participate in any of these programs?

2.4 Would Tesla support the development "make-ready" infrastructure programs by BC Hydro and FBC in B.C.?

2.4.1 Would Tesla participate in such programs?

**3.0 Topic: OEB Guidance Bulletin**  
**Reference: Exhibit C28-2, Tesla Evidence,**

"Ontario's utility commission, the Ontario Energy Board (OEB), issued a staff guidance bulletin on July 7, 2016, related to EV charging services and the role of the energy regulator in that province." [p.5]

3.1 Does Tesla support the OEB's guidance bulletin related to EV charging services?

3.2 In Tesla's view, would the concepts in the OEB's guidance bulletin be applicable to the BCUC's approach to the regulation of EV charging services?

**4.0 Topic: Role of BC Hydro and FBC in providing EV charging service**  
**Reference: Exhibit C28-2, Tesla Evidence,**

"As noted earlier, regulated utilities play important roles in the EV market. Increasing the deployment of electric vehicles and charging stations provides benefits for all ratepayers, and not just the EV owners or charging station site hosts. Therefore, it is appropriate for regulated utilities to recover their EV market expenses through their regulated rate base." [p.8]

"...it is important to recognize the importance of charging station availability when it comes to EV adoption..."

As such, utilities should be permitted to engage in make-ready projects or deploy charging infrastructure while generating a return. Make ready projects are more suited to recovery through the regulated rate base, while charging station installations may be more suited to non-regulated operations given that charging station operations are an end-use service and should not be deemed to be the retailing of electricity." [p.9]

4.1 In Tesla's view, is desirable for BC Hydro and/or FortisBC Inc. to provide DCFC charging services to EV drivers (i.e., beyond 'make-ready') in B.C. supported by the regulated rate base in the time period before public-facing EV service become commercially viable based only on revenues from fees for service (i.e., excluding host subsidies)?