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May 15, 2018

VIA EMAIL - DON_FLINTOFF@HOTMAIL.COM

Mr. Donald Flintoff

Dear Sir:

**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 DONALD FLINTOFF

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

May 15, 2018

1. Reference: Exhibit C4-2, Page 6

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.

- 1.1 Would it make sense for the exemption period to be matched to the expected useful life of the charging station equipment so that a reversal of exemption does not compromise the economic assumptions made by the party investing in the EV charging station business?
- 1.2 Would it make sense for a broader exemption to a class of non-regulated EV station providers be established with an ability to step up regulation if and only if serious problems were developing for the EV charging driver customers?

2. Reference: Exhibit C4-2, Page 14

No, the DCFC supply charging station rate should not be based on public utility's existing rates. Instead, a new tariff should be established that bills the DCFC charging stations on demand (kW), energy (kWh), and time-of-use power factor, etc.

- 2.1 Do you expect that such a rate should be a mandatory time of use rate and therefore be a rate within the normal commercial rate class?

3. Reference: Exhibit C4-2, Page 15

the capital expenditure side. There is a financial risk of substation, and distribution upgrades that most likely to occur since the EV charging stations will add significant load on the system which, in some cases, has not been designed to accommodate the new load. Because of the high power requirements of up to 240 kWatts per station, they can't just be connected to the grid anywhere. The electricity generating utility must provide a dedicated supply line capable of delivering the very high currents demanded.

- 3.1 Do you know what the range of commercial service sizes is for BC Hydro and FortisBC and if so could you provide them?
- 3.2 If not, would it not be expected that commercial services of 240kW would not be outside of the range of commercial service rates in general?
- 3.3 Why would one subset of the larger general service class of customers need different treatment with the possible exception of time of use rates, which is now under consideration by the Commission in BC Hydro's module 2 stage of rate design?

4. Reference: Exhibit C4-2, Page 17

As the battery and charging technology changes, there may even be more and better Level 4+ charging stations available. New higher capacity charging stations⁴ are already being built by BMW, who is leading the project through the 'FastCharge' consortium in partnership with other companies, like Porsche, Allego, Siemens and others, to charge EVs in 15 minutes at a charge rate of 450kW.

Fastned is a fast growing, private sector group, that is already offering these high capacity charging services in Europe. Fastned has two plans: Pay as you go at 0.59€/kWh or a fixed cost of 9.99€/month plus 0.35€/kWh.

- 4.1 Do you have any views with respect to the provision of DCFC services between the present time and the time at which other service providers would be enticed to move into the province?
- 4.2 Do you think that DCFC charging services from other market providers would enter BC more quickly if they were to receive the same subsidy treatment from all electricity ratepayers that the public electric utilities are seeking through inclusion of EV charging stations in their rate base?