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May 15, 2018

VIA EMAIL - JFISHER@UDI.ORG

Urban Development Institute – Pacific Region  
#200-602 West Hastings Street  
Vancouver, BC  
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Attention: Jeff Fisher

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 URBAN DEVELOPMENT INSTITUTE (“UDI”)**

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

**May 15, 2018**

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**1. Reference: Exhibit C9-2, Page 1**

The Inquiry is also important for our membership who are, for marketing purposes, or because of regulations, providing EVC infrastructure in new developments. At the same time, they are facing several regulatory obstacles, and have numerous questions pertaining to what they are allowed to implement or charge end users for. UDI hopes this BCUC Inquiry can provide clarity to our members, the homebuyers and tenants they serve. The current state of confusion is slowing down the placement of EVC infrastructure in newly constructed and older buildings, which in turn is hindering the adoption of electrical vehicles.

- 1.1 Would UDI prefer to have any and all of its developments exempt from regulation potentially as “public utilities” through a class exemption, enabling the reselling of electricity, covering any and all types of EV charging infrastructure that may be implemented based on market requirements?

**2. Reference: Exhibit C9-2, Page 2**

It is difficult to retrofit existing buildings with EVC infrastructure. Electrical rooms may need to be enlarged; electrical infrastructure within the building may need to be upgraded, and parking stalls will need to be wired (likely to a level 2 standard of 208 to 240 volts).

In addition to this, there may be BC Hydro infrastructure upgrades that need to occur to service the added load to buildings. This has significant cost implications ranging from tens of thousands of dollars to hundreds of thousands of dollars.

- 2.1 Would these problems be relieved if it were clear that these costs could be recovered from EV charging station customers?
- 2.2 Are these costs typically common area costs for buildings and recoverable through fees on one kind or another?

**3. Reference: Exhibit C9-2, Page 2**

Through this Inquiry, UDI asks that the BCUC provide clear authority to building owners or third party companies (who are being contracted to provide EVC infrastructure in new and older buildings) to resell electricity if it is used for the purposes of charging electric vehicles.

- 3.1 The Commission may not have jurisdiction to provide authority to building owners but may be able to exempt the building owners and third party providers from any restrictions on sell charging services to EV charging facility customers. Would that serve UDI interests satisfactorily?

**4. Reference: Exhibit C9-2, Page 3**

As part of the fee mechanism to resell electricity, we ask that the operating, maintenance, and administrative costs be able to be passed onto electrical vehicle owners. Ideally, the infrastructure costs noted above (amortized) could also be included. We hope the BCUC Inquiry will include a review of this matter.

- 4.1 If there is an exemption from being regulated as a utility then the building owners would be able to establish such fees as would be required to recover any costs related to providing the EV charging services. Would this be satisfactory to UDI interests?