

# William J. Andrews

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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 Vancouver Electric Vehicle Association  
(VEVA)

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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 VEVA. 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: **Vancouver Electric Vehicle Association (VEVA)**

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: EV charging station exemption from UCA regulation**  
**Reference: Exhibit C30-2, VEVA Evidence, p.6**

“Yes, VEVA believes that charging stations in British Columbia should be exempted or excluded from the definition of a “public utility” in the Utilities Commission Act, [RSBC 1996] CHAPTER 473 (UCA).

The UCA’s definition of a “public utility” significantly predates the development of the technology deployed in current EV charging stations, so it is clear that the drafters of that definition were not in a position to contemplate current circumstances and requirements relating to EV charging.

To facilitate innovation and competition, charging station owners should have the flexibility to charge EV drivers for charging services by hour, session or energy.

The services provided by chargers are not equivalent to the traditional sale of electricity as the service provided by the charging station is powering a vehicle’s battery for the specific limited use of providing power to an EV. Charging stations are not extensions of the distribution system and use technologies specific to fueling an EV rather than the equipment to transmit and distribute electricity. In that respect, charging stations are comparable to cell phone charging kiosks, camping propane tanks/canisters, etc.” [underline added]

“EV owners will also benefit from having choices for how their charging is priced: by time, by session or by energy, for example.” [p.5]

1.1 What is VEVA’s response to the view expressed by some that rates for EV charging services should be based exclusively on the amount of energy delivered (kWh), not charging time, because some EVs take longer than others to acquire a charge?