

**BRITISH COLUMBIA UTILITIES COMMISSION
INQUIRY INTO THE REGULATION OF ELECTRIC VEHICLE CHARGING SERVICES**

ChargePoint Inc. (ChargePoint) Information Request (IR) No. 1 to BC Hydro

May 15, 2018

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- 1. Reference: Exhibit C1-2, BC Hydro Written Evidence, p. 8
 Future Investment in Direct Current Fast Chargers (DCFC) by BC Hydro**

On page 8 of Exhibit C1-2, BC Hydro notes its intention to participate in the expansion of DCFC infrastructure across BC, in an effort to remove barriers to EV adoption and to support the DCFC market in the short-term. It states:

“While in the longer term the private sector is expected to play a much larger role in DCFC charging market, the current financial context likely requires that governments and utilities continue to actively support the deployment of DCFC infrastructure....

Consistent with its past efforts to remove barriers to the deployment of EVs in B.C., BC Hydro plans to continue to work with governments, business and other stakeholders to expand DCFC infrastructure in B.C.”

- 1.1 Please fully describe BC Hydro’s plan for the deployment of DCFC infrastructure and the role it sees for both utility and private investment.
- 1.1.1 Please confirm that BC Hydro will allow site host choice in station equipment and network services when it invests in future DCFC infrastructure and deployment. If not confirmed, please fully explain your response.
- 1.1.2 How does BC Hydro intend to determine which station equipment and network services will be used for infrastructure it makes investments in?
- 1.2 Does BC Hydro intend to allow DC fast charging site hosts set the prices that EV drivers pay when those hosts use infrastructure supported by BC Hydro? Please fully explain any response.
- 1.3 Please confirm that the “financial context” BC Hydro mentions refers to its view that the expected utilization of a DC fast charger will pay back its capital cost over too long a period of time to attract private investment. If not confirmed, please fully explain your response.
- 1.3.1 Please confirm that BC Hydro considers that DCFC costs reflect an economic barrier to entry. If not confirmed, please fully explain your response.

**2. Reference: Exhibit C1-2, BC Hydro Written Evidence, p.8-10
Competitive Environment and Captive Customers**

In Section 4 of Exhibit C1-2, BC Hydro states that there is not a fully competitive market for DCFC stations and there is limited customer choice for DCFC charging outside the urban areas in BC.

Specifically, on page 8 [in response to the Inquiry's question 1] of Exhibit C1-2 BC Hydro states:

"Currently in B.C. there are a limited number of DCFC stations, and outside of urban areas in particular there is not a fully competitive environment"

2.1 By "there is not a fully competitive environment" does BC Hydro mean only that there is a limited number of DCFC stations? Please fully explain your response.

On page 10 [in response to the Inquiry's question 2] of Exhibit C1-2, BC Hydro similarly states:

"Such customers might be captive to a very limited choice of public fast charging service outside of an urban core, with relatively more choice becoming available within urban areas as the market develops."

2.2 Please confirm that no EV drivers are limited to using DCFC stations. If not confirmed, please fully explain your response.

2.3 Please confirm that all EV drivers can use public Level 2 stations and home charging stations. If not confirmed, please fully explain your response.

**3. Reference: Exhibit C1-2, BC Hydro Written Evidence. p. 11
California Public Utilities Commission Decisions**

In Exhibit C1-2, on page 11, BC Hydro references the 2011 and 2014 decisions of the California Public Utilities Commission concerning EV charging. BC Hydro states:

"In late 2014 the California Public Utilities Commission reversed its ban on utility investment in EV charging infrastructure with the aim to accelerate the public EV charging market and improve the business case for the private sector, in support also of achieving climate-related targets."

3.1 Please confirm that:

- in 2009, California passed legislation that amended the PUC Code concerning the definition of "utility" and, subsequently, the CPUC issued rules prohibiting utilities from owning and operating charging stations;
- in 2011, the CPUC determined that utility owner/operatorship of charging stations was premature while the charging market continued to develop; and
- in 2014, the CPUC determined that a limited level of utility investment in charging stations was appropriate.

If not confirmed, please fully explain your response.

3.2 Please confirm that (i) Commission jurisdiction to regulate EV charging station infrastructure as a public utility service under the *Utilities Commission Act*, and (ii) the appropriateness of existing electric distribution public utilities investing in charging station

infrastructure, are two distinct issues. If not confirmed, please fully explain BC Hydro's view regarding the relationship between the two.

- 3.3 Please confirm that BC Hydro would not seek to include charging infrastructure in its rate base if doing so was likely to discourage private investment in charging infrastructure. If not confirmed, please fully explain your response.

**4. Reference: Exhibit C1-2, p.17
BC Hydro Customer Rates for Site Hosts**

On page 14 of Exhibit C1-2, Hydro states:

“Presently, BC Hydro charges resellers of electricity whose fast charging station is behind their meter at the existing rates applicable to those customers. For customers who install a stand-alone fast charging station, BC Hydro charges them under general service rates.”

- 4.1 Does BC Hydro plan to implement a charging station rate class or classes of service? If yes, when? If not, why not? Please fully explain any response.