

*Parks, Planning and Environment Department
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May 25, 2018

File: CP-02-02-GHGR-02

Mr. Patrick Wruck
Commission Secretary and Manager Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3
VIA EMAIL: commission.secretary@bcuc.com

Dear Mr. Wruck:

Re: Letter of Comment to British Columbia Utilities Commission on “An Inquiry into the Regulation of Electric Vehicle Charging Service”

Metro Vancouver has an interest in the outcome of Order G-10-18, an Inquiry into the Regulation of Electric Vehicle Charging Service, and has registered as an interested party.

The Province of British Columbia delegates to Metro Vancouver the authority to manage air quality within the region. Metro Vancouver’s *Integrated Air Quality and Greenhouse Management Plan* outlines goals to protect public health and the environment, and to minimize our region’s contribution to global climate change from all sectors of the economy, including on-road vehicles.

In 2008, Metro Vancouver set a regional target to reduce greenhouse gas emissions by 80 percent below 2007 levels by 2050, through land use, transportation, air quality and climate actions. This target is a foundation of the *Climate 2050 Strategic Plan* currently being developed by Metro Vancouver. Modeling demonstrates that a wide-scale transition to electric vehicles is required in this region to meet the greenhouse gas reduction targets adopted by our Board of Directors. Personal and commercial on-road vehicles are responsible for 36% of regional greenhouse gas emissions and 20% of smog-forming pollutants, according to Metro Vancouver’s emissions inventory. These emissions contribute to climate change, air quality degradation and adverse human health impacts.

Electric vehicle uptake in the Metro Vancouver region has been rapid in the past few years, rising from 140 vehicles in 2012 to almost 6,000 today. With short commute distances, low carbon electricity, and a mild climate, the Metro Vancouver region is ideally suited to electric mobility. Not surprisingly, over 80% of electric vehicle registrations in BC are located in this region.

Metro Vancouver has been actively engaging residents and businesses to build awareness and understanding, and increase uptake of electric vehicles, through programs such as Emotive: The Electric Vehicle Experience (www.emotivebc.ca), EVCondo.ca (www.evcondo.ca) and EVWorkplace.ca (www.evworkplace.ca). Metro Vancouver also provides public charging at some of our regional parks sites and other facilities, and is in the process of installing a publicly accessible DC Fast Charging station at our head office location in Burnaby. Recently, Metro Vancouver

commissioned a study by researchers at Simon Fraser University to better understand electric vehicle uptake in the next few years. This research revealed that 24% of new car buyers in Metro Vancouver are already interested in buying an electric vehicle. The study also found that many of these buyers will face a lack of reliable access to charging at home or at work.

Recognizing that lack of availability of charging infrastructure is a key impediment to electric vehicle uptake, in 2017, Metro Vancouver's Board of Directors submitted resolution, B116 "Resale of Electricity for Electric Vehicle Charging", to the Union of BC Municipalities (UBCM) for consideration at the 2017 convention. B116 recommended that the Province of British Columbia amend the *BC Utilities Commission Act* to exclude from the definition of a "public utility": 1) a strata corporation providing services to its members; and 2) a small-scale reseller of electricity at profit for the purpose of electric vehicle charging in public and private settings. This resolution, which was endorsed at the convention, highlighted the need to remove barriers that stifle innovation by the private sector to provide electric vehicle charging as a service. In their submission to the BCUC regarding this inquiry, UBCM specifically noted the endorsement of resolution B116 and other actions taken by local governments to increase the adoption of EVs as key climate actions. The UBCM submission has been attached to this letter for reference.

BC's ambitious climate targets are captured in provincial energy objectives as set out in the *BC Clean Energy Act*, particularly, "to use and foster the development in British Columbia of innovative technologies that support energy conservation and efficiency and the use of clean or renewable resources" and to reduce BC greenhouse gas emissions by 2050 and for each subsequent calendar year to at least 80% less than the level of those emissions in 2007. New legislation introduced by the BC government in May 2018 includes interim targets to reduce emissions 40% below 2007 levels by 2030 and 60% below 2007 levels by 2040. BCUC has an opportunity to support the *BC Clean Energy Act* by fostering the development of innovative EV charging solutions that move us closer to achieving our regional and provincial climate goals.

In closing, Metro Vancouver encourages BCUC to take measures that support expansion of the public EV charging network for residents and businesses transitioning to electric mobility. This letter presents the views of Metro Vancouver staff, and has not been reviewed or endorsed by the Metro Vancouver Board. We look forward to future opportunities to engage on this important initiative. Should you have any questions, please contact Roger Quan, Director, Air Quality and Climate Change, by email at roger.quan@metrovancover.org or by phone at 604-436-6770.

Sincerely,



Neal Carley, M.A.Sc., P.Eng.
General Manager, Parks Planning and Environment

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