



June 6, 2018

Mr. Patrick Wruck  
Commission Secretary  
British Columbia Utilities Commission  
6<sup>th</sup> Floor, 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

Please find enclosed responses from the British Columbia Ministry of Energy, Mines and Petroleum Resources to Information Requests No.1 received as part of the British Columbia Utilities Commission Inquiry into the Regulation of Electric Vehicle Charging Service (Project No.1598941) from:

- the British Columbia Utilities Commission (Exhibit A-20);
- **the BC Sustainable Energy Association and Sierra Club BC (Exhibit C6-3);**
- the Commercial Energy Consumers Association of BC (Exhibit C24-12);
- ChargePoint (Exhibit C25-6); and
- the Vancouver Electric Vehicle Association (exhibit C30-5).

If you have any questions regarding these responses or require any further information, please contact Shannon Craig at [Shannon.Craig@gov.bc.ca](mailto:Shannon.Craig@gov.bc.ca) or 778-698-7016.

Thank you.

Sincerely,

Les MacLaren  
Assistant Deputy Minister  
Electricity and Alternative Energy Division

Enclosures

**BC Ministry of Energy, Mines and Petroleum Resources**  
**Response to Information Request No. 1 from the BC Sustainable Energy Association and Sierra Club BC**

**British Columbia Utilities Commission**  
**Inquiry into the Regulation of Electric Vehicle Charging Service**

**Project No. 1598941**

**June 6, 2018**

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**1.0      Topic: Provincial Policies and Strategy Related to EVs and EV Charging Infrastructure**  
**Reference: Exhibit C19-2, section 3, page 2**

“The Province of British Columbia has committed to significant actions to reduce greenhouse gas (GHG) emissions. Priorities outlined in the most recent mandate letter for the Minister of Environment and Climate Change Strategy include the following:

- Renew the Climate Leadership Team within the first 100 days of your mandate; and
- Implement a comprehensive climate-action strategy that provides a pathway for BC to prosper economically while meeting carbon pollution reduction targets, including setting a new legislated 2030 reduction target and establishing separate sectoral reduction targets and plans.” [footnote omitted]

To follow through on these priorities, a Climate Solutions and Clean Growth Advisory Council has been established to provide strategic advice to government on climate action and clean economic growth. It includes members from First Nations, environmental organizations, industry, academia, labour and local government. Transportation is one of the key sectors that will be included in the comprehensive climate-action strategy and the Council will be considering a range of policy options to achieve carbon pollution reductions in that sector. The outcome of this Inquiry will assist with the Council’s consideration of policy options relating to EVs and EV charging infrastructure.” [p.2.]

- 1.1      Please provide an update on the plans and activities of the Province, the Ministry of Environment, and the Clean Growth Advisory Council to address the climate-action strategy described in the mandate letter of the Minister of Environment and Climate Change Strategy. Please include:

- 1.1.1    a discussion of anticipated time-lines, processes and milestones to carry out this work;

**RESPONSE:**

**The Province’s new climate action strategy will be released in fall 2018.**

**On May 7, the Government of British Columbia introduced legislation to update the Province’s greenhouse gas reduction targets. The Act legislates two new GHG reduction targets—a 40 per cent**

reduction from 2007 levels by 2030, and a 60 per cent reduction from 2007 levels by 2040, which set the foundation for the BC climate strategy. These stringent targets will help ensure BC stays on the path to achieve an 80 per cent reduction in emissions by 2050. The act received royal assent on May 31, 2018.

BC's fall climate strategy will outline the Province's vision for creating a sustainable clean growth economy and include strategies to meet BC's GHG reduction targets, through a sector by sector plan of action. The strategy will focus on priority areas as recommended by the Climate Solutions and Clean Growth Advisory Council.

In the coming weeks and months, BC residents will have an opportunity to provide input on priority areas of action and to help shape BC's climate strategy. More detail on this process will be made available on the government's website, expected in late June 2018.

- 1.1.2 a discussion of how this work will relate to other planning processes in BC that deal with energy and GHG emissions, particularly BC Hydro's Integrated Resource Plan; and

**RESPONSE:**

The mandate letter for the Minister of Energy, Mines and Petroleum Resources included direction to create a roadmap for the future of BC energy that will drive innovation, expand energy-efficiency and conservation programs, generate new energy responsibly and sustainably, and create lasting good jobs across the province. Although plans for the creation of the Energy Roadmap are still under development, it is anticipated that the Roadmap will include significant electrification of BC's economy, particularly electric vehicles, to reduce GHG emissions and align energy policies and actions with commitments made in BC's climate strategy. MEMPR expects that the Energy Roadmap will be completed by the end of this fiscal year. In turn, the Energy Roadmap will inform the development of BC Hydro's Integrated Resource Plan.

- 1.1.3 any further information that is available on the role that EVs may play in BC's climate action strategy, including a discussion of the possible roles of electrified commercial, freight and public transit vehicles.

**RESPONSE:**

It is anticipated that EVs will play a significant role in BC's climate strategy. In an April 25, 2018 letter<sup>1</sup> to the Minister of Environment and Climate Change Strategy, the Climate Solutions and Clean Growth Advisory Council (the Advisory Council) recommends that ZEVs are prioritized as input to the upcoming sectoral plans. In 2015, British Columbia joined 13 other jurisdictions under the International ZEV Alliance, which is working towards ensuring all new passenger vehicles sold in a member's jurisdiction will be zero emission as quickly as possible, and no later than the year 2050. In its letter, the Advisory Council also advises that BC's climate strategy will need to define clear actions to reach this goal.

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<sup>1</sup> [https://www2.gov.bc.ca/assets/gov/environment/climate-change/advisory-council/cscg\\_letter\\_to\\_minister\\_heymann.pdf](https://www2.gov.bc.ca/assets/gov/environment/climate-change/advisory-council/cscg_letter_to_minister_heymann.pdf)

**In addition to the work underway as part of BC's climate strategy, Translink and private companies such as West Coast Sightseeing are independently developing plans and strategies to electrify their fleets.**

**2.0 Topic: Provincial Policies and Strategy Related to EVs and EV Charging Infrastructure**

**Reference: Exhibit C19-2**

- 2.1 Please file the mandate letter for the Minister of Energy, Mines and Petroleum Resources, dated July 18, 2017.

- 2.2 Please confirm that the MEMPR mandate letter includes the following:

"In your role as Minister of Energy, Mines, and Petroleum Resources I expect that you will make substantive progress on the following priorities:

- Create a roadmap for the future of B.C. energy that will drive innovation, expand energy-efficiency and conservation programs, generate new energy responsibly and sustainably, and create lasting good jobs across the province."

**RESPONSE:**

**The mandate letter is included at the end of this document and includes the quoted text above.**

- 2.3 Please discuss the plans and activities of MEMPR and the Province to address the "roadmap for the future of B.C. energy," described in the mandate letter. Please include:

- 2.3.1 a description of the scope of the mandate as interpreted by MEMPR;
- 2.3.2 a discussion of anticipated time-lines, processes and milestones to carry out this work;
- 2.3.3 a discussion of how this work will relate to other planning processes in BC that deal with energy and GHG emissions, particularly BC Hydro's Integrated Resource Plan; and
- 2.3.4 any further information that is available on the role that EVs may play in BC's energy roadmap, including a discussion of the possible roles of electrified commercial, freight and public transit vehicles.

**RESPONSE:**

**In terms of scope, the Energy Roadmap is expected to include both the production and consumption of energy. For the remainder of this question, see the response to question 1.1.2 above.**

### **3.0 Topic: Provincial Policies and Strategy Related to EVs and EV Charging Infrastructure**

**Reference: Exhibit C19-2, section 8, page 9**

“MEMPR supports a significant expansion of public EV charging infrastructure in BC, which will be required in order for the Province to meet provincial, national and international commitments on climate change, reduce transportation-related GHG emissions and increase the number of ZEVs on the roads in BC. To facilitate this expansion, MEMPR supports the reduction of undue regulatory burden and cost of providing EV charging services in BC, so long as the interests of ratepayers and consumers are protected and safety considerations are adequately addressed.”

- 3.1 Please discuss the extent to which MEMPR’s support for reducing undue regulatory burden and cost of providing EV charging services in BC extends to fleet EVs and EVs used for public transit.

**RESPONSE:**

**MEMPR encourages an expansion in fleet EVs and the use of EVs for public transit. MEMPR supports reducing undue regulatory burden and cost of providing EV charging services associated with public EV charging infrastructure in order to provide benefits for all potential users of that infrastructure. This would include fleet EVs and EVs used for public transit, if their owners and drivers choose to use public charging services. MEMPR assumes that most fleet EVs and EVs used for public transit use their own private company infrastructure (which does not have the same regulatory oversight by the Commission) for their charging needs.**

**Currently, MEMPR has two programs to reduce the cost of EVs for fleets: 1) the Fleet Champions Program, which provides a rebate to fleets for the installation of EV charging infrastructure for use by the fleet; and 2) the Specialty-Use Vehicle Incentive Program, which provides rebates to fleets for the purchase of plug-in electric and hydrogen fuel cell vehicles, including medium-duty vehicles such as buses used by public transit.**

- 3.2 Please confirm that the term “public EV charging infrastructure” means EV charging infrastructure available to the public; i.e., that the intention is not to express a preference for public bodies, rather than private entities, to provide EV charging infrastructure.

**RESPONSE:**

**Yes, MEMPR uses the term public EV charging infrastructure to mean EV charging infrastructure available to the public. MEMPR supports a role for private entities in the EV charging market.**

**4.0 Topic: Economic benefits of CEVs**  
**Reference: Exhibit C19-2, page 2**

“The CEV Program is intended to encourage and accelerate the adoption of ZEVs in British Columbia for both their environmental and economic benefits.”

- 4.1 Please elaborate of the “economic benefits” of ZEVs referred to in the sentence quoted above.

**RESPONSE:**

**In general, ZEVs offer more affordable operating costs than conventional fossil fuel vehicles through reduced fuel and servicing costs. In addition, electric vehicles utilize fuel (electricity) produced in British Columbia, providing demand for the province’s 98% clean electricity. There are further benefits from improved air quality and associated health benefits, reducing demands on the health care system.**

**MEMPR commissioned a Clean Energy Vehicle Economic Opportunities Assessment, which is publicly available at [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/cev\\_economic\\_opportunities\\_final\\_report.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/cev_economic_opportunities_final_report.pdf)**

**5.0 Topic: Inter-jurisdictional issues with EVs or ZEVs**

**Reference: Exhibit C19-2, pp. 3 – 4**

“The Province is also working with other jurisdictions to promote the uptake of ZEVs [i.e., zero-emission vehicles, including EVs]. Under the Pan-Canadian Framework on Clean Growth and Climate Change, federal, provincial and territorial governments committed to work with industry and stakeholders to develop a Canada-wide ZEV strategy by 2018. This strategy will be ambitious and will build on existing initiatives, such as light-duty vehicle regulations, provincial ZEV programs, and Canadian innovation superclusters, to help meet Canada’s 2030 GHG emissions reduction target and realize the country’s potential as a global leader in innovation and the clean economy.”

“The Pacific Coast Collaborative (PCC) is a joint initiative of California, Oregon, Washington, and British Columbia to accelerate a vibrant, low-carbon economy on the West Coast. On October 28, 2013, the Governors and Premier of the PCC jurisdictions announced the Pacific Coast Action Plan on Climate and Energy. A key element of the action plan was to “take actions to expand the use of zero-emission vehicles, aiming for 10 percent of new vehicle purchases in public and private fleets by 2016.” That initial goal has now expanded to include fleets that aim for more than 10 percent and to establish a new target year of 2020.”

“In 2015, BC became the 14th jurisdiction to sign on to the International ZEV Alliance, which is a collaboration of national and subnational governments working together to accelerate adoption of ZEVs. Members of the Alliance are striving to make all new passenger vehicles in their jurisdictions ZEVs by no later than 2050.” [footnotes removed]

- 5.1 Please confirm that the Pan-Canadian Framework on Clean Growth and Climate Change is Canada's framework initiative for Canada to meet its GHG reduction targets necessary to meet its international commitments under the 2015 Paris Agreement to limit global warming to below 2 degrees Celsius.

**RESPONSE:**

**The Pan-Canadian Framework on Clean Growth and Climate Change is Canada's framework initiative to meet its 2030 target of reducing GHG emissions by 30 percent below 2005 levels. More information can be found at**

**<https://www.canada.ca/en/services/environment/weather/climatechange/pan-canadian-framework/climate-change-plan.html>**

- 5.2 Please provide more details on the timelines of the Pan-Canadian Framework process, how BC is participating in the process and how it relates to BC's climate action planning.

**RESPONSE:**

**As part of the Pan-Canadian Framework on Clean Growth and Climate Change, the federal government initiated the development of a National ZEV Strategy aimed at “putting more ZEVs on the road” in Canada. The National ZEV Strategy is due to be released in fiscal 2018/2019.**

**In Spring 2017, Canada established a National ZEV Strategy Advisory Group made up of federal, provincial and territorial (FPT) governments, industry, and non-profit organizations, as well as a FPT Steering Group. Transport Canada and BC co-chair the National ZEV Strategy Advisory Group and FPT Steering Group. The National ZEV Strategy Advisory Group established five Expert Groups each charged with providing a series of potential actions. The FPT Steering Group is undertaking further analysis of potential measures and targets. BC is actively participating in the FPT Steering Group.**

**Working with Canada and other provinces and territories will assist BC in increasing the number of ZEVs in the province. As MEMPR noted in its submission, Natural Resources Canada has provided funding for infrastructure and is active in promoting awareness and education on ZEVs. Both BC and Quebec are members of the International ZEV Alliance and have set a 2050 target for all new light duty vehicle sales to be ZEVs.**

**MEMPR expects that both the Energy Roadmap and climate action strategy will include electrification of the transportation sector as a means of decarbonizing that sector. Coordinating efforts under the Pan-Canadian Framework will assist in creating greater adoption of ZEVs in Canada and in BC.**

- 5.3 Please provide more details on BC's participation in the PCC and the International ZEV Alliance, including the goals and timelines of these initiatives and how they relate to BC's climate action planning.

**RESPONSE:**

**BC's climate action planning considers goals and commitments established through interjurisdictional agreements. See responses to question 1.1.3 and 5.2 for further information on how commitments made under the International ZEV Alliance are being considered during BC's climate action planning.**

The Pacific Coast Collaborative (PCC) is a partnership between BC, Washington, Oregon and California to develop and adopt west coast-focused climate change and energy strategies such as carbon pricing, expanding the use of zero-emission vehicles and low-carbon fuels, increasing the energy efficiency of large buildings, and adaptation. Recent joint actions include the inclusion of leading west coast cities in the PCC through the PCC Cities Agreement, the creation of an International Ocean Acidification Alliance, and exploratory work on tackling short-lived climate pollutants.

PCC goals include transitioning the West Coast to clean modes of transportation and reducing greenhouse gas emissions from this sector with actions to:

1. Create a robust regional market for low carbon transportation fuels.
2. Accelerate the transition of West Coast vehicle fleets to ZEVs by reducing infrastructure and financial barriers to adoption and creating the opportunity for full electrification of fleet operations where suitable.
3. Lower the up-front cost and increase availability of zero-emission vehicles through bulk purchasing programs for passenger vehicle and transit fleets.
4. Work together to increase access to affordable alternative fuel vehicles for low income communities through fleet surplus policies and other support programs.

BC's involvement in the PCC includes assisting in the development and ongoing operation of West Coast Electric Fleets, which includes a goal to have fleets in the region aim for a ZEV target of 10 percent or more of new vehicle purchases in public and private fleets by 2020. The PCC jurisdictions are also actively collaborating on charging infrastructure investments, primarily through the long-standing regional collaboration on the West Coast Electric Highway.

5.4 What factors regarding BC's inter-jurisdictional activities on EVs should the Commission take into account in the present Inquiry?

5.4.1 For example, should the Commission seek to harmonize regulatory measures in BC with those in other jurisdictions, with a view to minimizing any cross-jurisdictional barriers to EV use of provision of EV charging services?

**RESPONSE:**

MEMPR presented information regarding its interjurisdictional commitments in its submission to the Inquiry in order to provide the context within which provincial policies and activities designed to promote the uptake of EVs were developed. MEMPR is not suggesting that the Commission should seek to harmonize BC's regulation of the EV charging market with the regulatory schemes in other jurisdictions; however, there may be specific components of the EV charging market that would benefit from harmonization across jurisdictions, such as the use of open protocols and networks.

**6.0 Topic: MURBs**

Reference: Exhibit C19-2, MEMPR Evidence, p.10

"...there are well-documented hurdles for residents of multi-unit residential buildings to install and access charging facilities in their buildings."

- 6.1 Please describe any legislative, regulatory or policy measures the government is taking to help overcome the barriers to the provision of EV charging infrastructure in strata corporation buildings and multiple unit rental buildings.

**RESPONSE:**

**The Province has put a variety of measures and programs in place to overcome barriers to the provision of EV charging infrastructure in stratas and multiple unit rental buildings. MEMPR's Charging Solutions and Incentives Program provides incentives and support services for multi-unit residential building charging infrastructure and installation.**

**The Strata Property Regulation was amended on March 7, 2018 to include user fees for services or costs of service that only apply to common property and common assets.<sup>2</sup> This change allows a strata corporation to adopt a bylaw or rule that sets out a cost for electric vehicle charging at a fixed rate per hour of charging that would include both the reasonable cost of electricity and the cost of any upgrades or maintenance requirements of the strata corporation.**

**EV chargers have been defined as a matter that is “out of scope” under the *Building Act*.<sup>3</sup> This means that a local government can regulate with respect to EV chargers if they have authority to do so in another statute. This gives local governments greater flexibility in making decisions regarding the use of EV charging infrastructure in new developments.**

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<sup>2</sup> [https://www2.gov.bc.ca/assets/gov/housing-and-tenancy/strata-housing/36\\_2018.pdf](https://www2.gov.bc.ca/assets/gov/housing-and-tenancy/strata-housing/36_2018.pdf)

<sup>3</sup> See [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/guides/baguide\\_b1appendix\\_rev\\_feb2017.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/construction-industry/building-codes-and-standards/guides/baguide_b1appendix_rev_feb2017.pdf) for further information

## Response to question 2.1 - Minister of Energy, Mines and Petroleum Resources Mandate Letter



July 18, 2017

Honourable Michelle Mungall  
Minister of Energy, Mines, and Petroleum Resources  
Parliament Buildings  
Victoria, British Columbia V8V 1X4

Dear Minister Mungall:

Congratulations on your new appointment as Minister of Energy, Mines, and Petroleum Resources.

It has never been more important for new leadership that works for ordinary people, not just those at the top.

It is your job to deliver that leadership in your ministry.

Our government made three key commitments to British Columbians.

Our first commitment is to make life more affordable. Too many families were left behind for too long by the previous government. They are counting on you to do your part to make their lives easier.

Our second commitment is to deliver the services that people count on. Together, we can ensure that children get access to the quality public education they need to succeed, that families can get timely medical attention, and that our senior citizens are able to live their final years with dignity.

These and other government services touch the lives of British Columbians every day. It is your job as minister to work within your budget to deliver quality services that are available and effective.

Our third key commitment is to build a strong, sustainable, innovative economy that works for everyone, not just the wealthy and the well-connected. Together, we are going to tackle poverty and inequality, create good-paying jobs in every corner of the province, and ensure people from every background have the opportunity to reach their full potential.

These three commitments along with your specific ministerial objectives should guide your work and shape your priorities from day to day. I expect you to work with the skilled professionals in the public service to deliver on this mandate.

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Office of the  
Premier

Web Site:  
[www.gov.bc.ca](http://www.gov.bc.ca)

Mailing Address:  
PO Box 9041 Sta Prov Govt  
Victoria BC V8W 9E1

Location:  
Parliament Buildings  
Victoria

As you are aware, we have set up a *Confidence and Supply Agreement* with the B.C. Green caucus. This agreement is critical to the success of our government. Accordingly, the principles of “good faith and no surprises” set out in that document should also guide your work going forward.

As minister, you are responsible for ensuring members of the B.C. Green caucus are appropriately consulted on major policy issues, budgets, legislation and other matters as outlined in our agreement. This consultation should be coordinated through the Confidence and Supply Agreement Secretariat in the Premier’s Office. The secretariat is charged with ensuring that members of the B.C. Green caucus are provided access to key documents and officials as set out in the agreement. This consultation and information sharing will occur in accordance with protocols established jointly by government and the B.C. Green caucus, and in accordance with relevant legislation.

British Columbians expect our government to work together to advance the public good. That means seeking out, fostering, and advancing good ideas regardless of which side of the house they come from.

Our government put forward a progressive vision for a Better B.C. that has won broad support with all members of the legislature. There is consensus on the need to address many pressing issues such as reducing health-care wait times, addressing overcrowded and under-supported classrooms, taking action on climate change, tackling the opioid crisis, and delivering safe, quality, affordable child care for all. As one of my ministers, I expect you to build on and expand that consensus to help us better deliver new leadership for British Columbians.

As part of our commitment to true, lasting reconciliation with First Nations in British Columbia our government will be fully adopting and implementing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the Calls to Action of the Truth and Reconciliation Commission. As minister, you are responsible for moving forward on the calls to action and reviewing policies, programs, and legislation to determine how to bring the principles of the declaration into action in British Columbia.

In your role as Minister of Energy, Mines, and Petroleum Resources I expect that you will make substantive progress on the following priorities:

- Create a roadmap for the future of B.C. energy that will drive innovation, expand energy-efficiency and conservation programs, generate new energy responsibly and sustainably, and create lasting good jobs across the province.
- Reinvigorate the Innovative Clean Energy fund to boost investments in groundbreaking new energy technologies and climate change solutions.
- Freeze B.C. Hydro rates while conducting a comprehensive review of the Crown corporation.
- Immediately refer the Site C dam construction project to the B.C. Utilities Commission on the question of economic viability and consequences to British Columbians in the context of the current supply and demand conditions prevailing in the B.C. market.
- Establish a BC Mining Jobs Task Force to create and sustain good jobs in this important industry.

- Develop an improved and properly resourced approvals process to assess mining applications, and increase industry safety by establishing an independent oversight unit.
- Ensure British Columbians benefit from liquefied natural gas projects by requiring proposals to meet the following four conditions:
  - (1) Proposals must include express guarantees of jobs and training opportunities for British Columbians;
  - (2) Proposals must provide a fair return for our resource;
  - (3) Proposals must respect and make partners of First Nations; and
  - (4) Proposals must protect our air, land and water, including living up to our climate commitments.

All members of Cabinet are expected to review, understand and act according to the *Members Conflict of Interest Act* and to conduct themselves with the highest level of integrity. Remember, as a minister of the Crown, the way you conduct yourself will reflect not only on yourself, but on your Cabinet colleagues and our government as a whole.

I look forward to working with you in the coming weeks and months ahead.

It will take dedication, hard work, and a real commitment to working for people to make it happen, but I know you're up to the challenge.

Sincerely,



John Horgan  
Premier