



June 6, 2018

Mr. Patrick Wruck
Commission Secretary
British Columbia Utilities Commission
6th 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 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 Vancouver Electric Vehicle Association (VEVA)**

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

Project No. 1598941

June 6, 2018

Supporting EV Uptake

1.0 References: Exhibit C19-2, pp. 2 to 4, Section 3

MEMPR notes a number of actions taken to support EV uptake and infrastructure.

Exhibit C19-2, p.9

MEMPR also states:

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.

1.1 Please describe MEMPR's plans for continued support of EV infrastructure deployment across the province? Please include discussion of the following:

- a. The types of infrastructure that will be supported (e.g. home, multi-unit residential buildings (MURBs), workplaces, public spaces, highways/corridors, etc.);
- b. The nature of the planned support for each type of charging station location (e.g. direct funding, grants, subsidies, incentives, tax credits, etc.);
- c. Support for right-to-charge policies for residents of MURBs;
- d. Incentives for workplace fast charging;
- e. Support for curbside fast charging;
- f. The timeframe within such support is likely to be offered (e.g. start dates for each type of charging station location, duration of support, expiry of support if any, etc.).

RESPONSE:

Introduced in 2011, the Clean Energy Vehicle (CEV) Program was designed to reduce barriers to the adoption of CEVs, including the cost and availability of new vehicles and the availability of charging infrastructure. On an ongoing basis, MEMPR evaluates what support the market requires to continue the adoption of EVs in BC and to ensure targets and goals are reached. Generally, MEMPR develops policies and programs to address the largest market barriers first. The nature of the support and

policies regarding EV infrastructure support are expected to evolve as the market develops in BC. This makes it difficult to describe MEMPR's future plans in detail as requested.

- a. From now until 2020, MEMPR is providing financial support for EV charging infrastructure deployment in workplaces and residential buildings and for DCFCs. MEMPR expects to support other charging methods in the future.
- b. To date, MEMPR's support has been via planning, financial support and policy development. MEMPR expects to continue to support all types of EV charging with financial incentives, as appropriate. As the market develops, MEMPR's support may include more than just financial incentives, and other types of support are being explored by MEMPR.
- c. MEMPR is supporting provincial work on right-to-charge policies but this is not a direct responsibility of MEMPR.
- d. See a. and b. above.
- e. See a. and b. above.
- f. MEMPR expects that the CEV Program will be operational and provide funding to support the deployment of EV infrastructure across the province until at least 2020. MEMPR expects support to be offered to the market for the long-term in order to achieve adoption targets and GHG reductions in BC but no further specificity regarding timeframes is available at this time.

1.2 In addition to MEMPR's current support for charging infrastructure deployment, does it intend to work with other BC ministries to address regulatory barriers to EV deployment in strata and apartments with amendments to legislation (e.g. the *Strata Property Act*, *Residential Tenancy Act*, etc.) to make it easier for developers, property owners, tenants, and strata corporations to install EV charging infrastructure in residential, commercial and mixed-use buildings? If so, please discuss.

RESPONSE:

MEMPR is currently working with other provincial ministries to address regulatory barriers to EV deployment in strata buildings in BC. 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. The 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.¹ 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.

¹ https://www2.gov.bc.ca/assets/gov/housing-and-tenancy/strata-housing/36_2018.pdf

EV chargers have been defined as a matter that is “out of scope” under the *Building Act*.² 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.

Charging Service By kWh

2.0 Reference: Exhibit C19-2, pp. 7 and 11

MEMPR notes on page 7:

Measurement Canada regulates EV charging station meters but has not yet approved any meters for use in EV charging stations that sell electricity on the basis of energy.

MEMPR notes on page 11:

Until Measurement Canada approves meters that can base rates on electricity consumption, rates based on time appear to be an appropriate surrogate. MEMPR encourages utilities and charging station manufacturers to work with Measurement Canada to speed the development of approved consumption-based meters for use in charging stations.

2.1 Does MEMPR agree that the ability to charge for EV charging service by kWh will help remove barriers to EV charging deployment, especially for EV charging services provided by strata corporations or landlords? Please explain.

RESPONSE:

The current regulatory scheme governing the provision of for-compensation EV charging services and the cost of installing EV charging infrastructure appear to be more significant barriers to EV charging station deployment than the lack of Measurement Canada-approved meters that can base charging rates on electricity consumption. MEMPR recognizes that EV owners living in strata corporations may face a number of unique challenges in accessing EV charging infrastructure at their homes. In an effort to address some of these concerns, the Strata Property Regulation was amended on March 7, 2018 and now allows strata corporations to charge user fees for services or costs of service that only apply to common property and common assets, such as EV charging.

2.2 Does MEMPR also intend to work with Measurement Canada to encourage and speed up the development of certification for consumption-based meters in EV charging stations? For example, would MEMPR commit to making a formal request to Measurement Canada outlining the importance of developing consumption-based meters for use in charging stations as soon as practical? Please include discussion of other specific anticipated actions and the related timeframes.

² 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 for further information

RESPONSE:

MEMPR had not planned to work with Measurement Canada to encourage and speed up the development of certification for consumption-based meters in EV charging stations. In the opinion of MEMPR, charging station manufacturers and entities installing for-compensation EV charging stations would be better positioned to provide the necessary input on this topic to Measurement Canada. MEMPR can consider additional actions in this regard based on any findings or recommendations flowing from this inquiry.