



Tesla Motors Canada ULC
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June 6, 2018

Via Email
wjandrews@shaw.ca

William J. Andrews
Barrister & Solicitor
1958 Parkside Lane,
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RE: **BCUC Inquiry into the Regulation of Electric Vehicle Charging Service, Project
No.1598941 BCSEA and SCBC Information Request to Tesla Motors Canada ULC
(Tesla)**

Dear Sir:

Attached please find Tesla Motors Canada ULC Information Request on written evidence with respect to the British Columbia Utilities Commission – An Inquiry into the Regulation of Electric Vehicle Charging Service – Project Number 1598941.

For any clarifications or further information please do not hesitate to contact the undersigned.

Yours Sincerely,

A handwritten signature in blue ink that reads "Iain Myrans".

Iain Myrans
Manager, Government Relations, Canada.

cc: BCUC - Atten: Patrick Wruck, Commission Secretary
cc: Registered Interveners

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

**RESPONSES TO INFORMATION REQUEST NO. 1
MADE OF TESLA MOTORS CANADA ULC BY BC SUSTAINABLE
ENERGY ASSOCIATION & SIERRA CLUB BC (C6-7)**

1.0 Topic: Tesla EV charging network
Reference: Exhibit C28-2

“Tesla customers are not captive to using Tesla chargers and may use a wide variety of charging services – whether from Tesla or third parties.” [p4]

1.1 Please discuss the extent to which drivers of EVs that are not Tesla vehicles are able (physical connection) or allowed (per Tesla policy) to use Tesla’s EV charging stations.

1.1 RESPONSE

Currently, Tesla vehicles and charging stations use a connector that other brands of vehicles may not physically be able to utilize for charging. However, Tesla has offered other automakers the ability to use Tesla’s standard connector on their automobiles. No other automaker has accepted that standard to date. Further, Tesla does not execute exclusivity agreements with charging site hosts.

1.2 Is this expected to change in the future? If so, in what direction? Does Tesla see a future in which its EV charging services are reticently utilized by non-Tesla drivers.

1.2 RESPONSE

See 1.1 Response.

2.0 Topic: EV charging availability in B.C., make-ready service.
Reference: Exhibit C-28-2.

“Although third parties are developing charging networks, regulated utilities also play an important role in the deployment of EV chargers and the EV marketplace. Utilities provide electrical service to new stations, send price signals through rate designs, and can help increase customer education and awareness of EVs and charging stations. In those few situations where the competitive market is not providing an adequate supply of EV charging infrastructure (such as in remote communities and multi-unit dwellings) it may be appropriate for regulated utilities to participate more actively in the EV charging market. Unlike competitive charging companies which do not use ratepayer funds, a regulated utility that participates in the EV charging market with ratepayer funds should have their activities overseen by the Commission. Currently the three major California investor-owned utilities have active “make-ready” infrastructure programs in which the utilities own infrastructure beyond the customer’s meter, including the electrical panel and conduit. These programs are in place to deploy more level-2 charging infrastructure and require the review and approval of the California Public Utilities Commission

prior to deployment.” [p.6, underline added]

2.1 In addition to Tesla, what other third parties are developing EV charging networks in BC?

2.1 RESPONSE

According to Natural Resources Canada, the following other networks are active in BC: AddEnergie, Chargepoint, Green Lots, GE WattStation, and several other independent operators.¹

2.2 Does Tesla consider that, apart from the few situations such as in remote communities and multi-unit dwellings, there is an adequate supply of EV charging infrastructure in B.C. at the present time.

2.2 RESPONSE

No. However, Tesla believes that the competitive market for end use charging services will continue to grow alongside adoption rates. Further, Tesla continues to plan and build additional charging stations throughout the province alongside this demand and expects that other private operators and site hosts will continue to do the same within a competitive market as adoption rates increase. Tesla welcomes broad participation in the growing EV charging marketplace.

2.2.1 Does this view apply to Tesla vehicles only, or does it apply to all brands of EVs.

2.2.1 RESPONSE

All EV brands.

2.3 Does Tesla support the California investor-owned utilities “make-ready” infrastructure programs?

2.3 RESPONSE

Yes.

2.3.1 Does Tesla participate in any of these programs?

2.3.1 RESPONSE

Not currently.

2.4 Would Tesla support the development of “make-ready” infrastructure programs by BC Hydro and FBC in B.C.?

2.4 RESPONSE

Yes.

¹ See Natural Resources Canada Data at:
<http://www.nrcan.gc.ca/energy/transportation/personal/20487#/analyze?region=BC&fuel=ELEC>

2.4.1 Would Tesla participate in such programs?

2.4.1 RESPONSE

Tesla cannot commit to participation in a hypothetical program before having the opportunity to review the program’s details, but Tesla would be willing to help inform the design of such programs. Tesla would generally welcome and support the development of make-ready programs.

**3.0 Topic: OEB Guidance Bulletin
Reference: Exhibit C-28-2.**

“Ontario’s utility commission, the Ontario Energy Board (OEB), issued a staff guidance bulletin on July 7, 2016, related to EV charging services and the role of the energy regulator in that province.” [p.5]

3.1 Does Tesla support the OEB’s guidance bulletin related to EV charging services?

3.1 RESPONSE

Yes.

3.2 In Tesla’s view, would the concepts in the OEB’s guidance bulletin be applicable to the BCUC’s approach to the regulation of EV charging services.

3.2 RESPONSE

Yes.

**4.0 Topic: Role of BC Hydro and FBC in providing EV charging service
Reference Exhibit C28-2, Tesla Evidence**

“As noted earlier, regulated utilities play important roles in the EV market. Increasing the deployment of electric vehicles and charging stations provides benefits for all ratepayers, and not just the EV owners or charging station site hosts. Therefore, it is appropriate for regulated utilities to recover their EV market expenses through their regulated rate base.” [p.8]

“...it is important to recognize the importance of charging station availability when it comes to EV adoption...

As such, utilities should be permitted to engage in make-ready projects or deploy charging infrastructure while generating a return. Make ready projects are more suited to recovery through the regulated rate base, while charging station installations may be more suited to non-regulated operations given that charging station operations are an end-use service and should not be deemed to be the retailing of electricity.” [p.9]

4.1 In Tesla's view, is [it] desirable for BC Hydro and/or FortisBC Inc. to provide DCFC charging services to EV drivers (i.e. beyond 'make-ready') in B.C. supported by the regulated rate base in the time period before public-facing EV service becomes commercially viable based only on revenues from fees for service (i.e. excluding host subsidies)?

4.1 RESPONSE

It is not reasonable to assume that only one business model exists for EV charging services that mimics a service like gasoline fueling services, as suggested by the question.

While Tesla supports make-ready investments by utilities, it also supports broader investments by all parties in EV charging end-use services. In the spirit of increasing EV adoption rates, Tesla is generally supportive of utilities investing in end-use charging services, particularly in less competitive markets, provided that the private sector may also continue to make investments.