



June 6, 2018

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

Dear Mr. Wruck,

Enclosed please find Greenlots' response to Information Request No.1 from BCOAPO as part of the Commission's Inquiry into the Regulation of Electric Vehicle Charging Service, Project No.1598941.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Ashley". The signature is fluid and cursive, with a large initial "T" and "A".

Thomas Ashley
Vice President, Policy

June 6, 2018

Project No. 1598941: 'Inquiry into the Regulation of Electric Vehicle Charging Service'

Greenlots Response to Information Request No. 1 from BCOAPO

1.0 Reference: Exhibit C15-2, pages 2 and 5

- 1.1 Greenlots advocates that, given the current state and stage of development of the EV charging station market, there is currently a role for public investment and the involvement of regulated monopolies. Would the need for public investment and the involvement of regulated monopolies cease at some point in time when the market was sufficiently developed?

Response:

The need for regulated utility investment in charging infrastructure will likely decrease over time, as the economics for the private market improve. Greenlots believes however that electric utilities are intrinsically important to transportation electrification, and while their role may evolve over time, we don't perceive a point in the future where they are not inherently relevant or do not have a part to play in such efforts.

- 1.1.1 If no, why not?

Response:

In Greenlots' view, this is not a yes or no question.

- 1.1.2 If yes, how should the Commission determine when this need/involvement is no longer required?

Response:

In Greenlots' view, this is not a yes or no question.

- 1.1.3 Should regulated monopolies be required to divest themselves of this activity (e.g., transfer to a separate, unregulated entity or subsidiary) when a sufficiently competitive market has developed?

Response:

This consideration would inherently require a definition for what is meant by or a specific metric for determining a competitive market. As mentioned previously, we do not perceive that a competitive market will exist in the near future. We expect that the Commission will be cognizant of evolving market conditions and treat future utility investment decisions or requests appropriately.

2.0 Reference: Exhibit C15-2

- 2.1 Greenlots has stated that there is currently not a competitive market for the offering of EV charging services to drivers (p. 1). Under such circumstances why is there not a role for the Commission to regulate the services provided by non-utility operators of EV charging stations in order protect consumers from discriminatory pricing?

Response:

As transportation electrification continues to grow, considerations for consumer protection will be increasingly relevant. In the current state of the market, we think it is appropriate for third party investors to have reasonable flexibility in setting consumer pricing. However, we are cognizant that amongst other reasons, fuel cost savings is a significant motivator for EV adoption. We believe that rates for EV charging are best structured to result in such savings to the driver over traditional fueling, and that utilities are likely best positioned to be able to offer such pricing.