



BCUC REGULATION OF ELECTRIC VEHICLE
CHARGING SERVICE INQUIRY EXHIBIT C3-4

TO:

Patrick Wruck
Commission Secretary and Manager
British Columbia Utilities Commission
Vancouver, BC

From:

Drive Energy
PO BOX 608
Squamish, BC
V8B 0A5

Attention: Christopher P. Weafer - Owen Bird Law Corporation for Commercial Energy Consumers Association of British Columbia

RE: British Columbia Utilities Commission Inquiry into the Regulation of Electric Vehicle Charging Service,_, Project No. 1598941 - Request C21-6

Dear M. Wruck,

Thank you for your interest into our request to the British Columbia Utility Commission.

Please see answered questions to your previous request below.

Sincerely,

Maxime Charron
Drive Energy Inc.



1.0 Reference: Exhibit C3-2, pages 2-3 (Issue #3)

1.1 Should the regulation of DCFCs be based on a traditional cost of service model approach? If, in Drive Energy's opinion, some other approach should be used, what would it recommend?

- 1.1.1. There is not specification on what traditional cost of service model would be as gas pricing structure cannot be compared to electricity fee structure. The recommended structure would be a combination of fee per hour - per kWh - with a cap on the amount that can be charged to avoid collusion in smaller or larger jurisdictions. This cannot be a policy on which it would apply to "all". A special attention on the type of charging infrastructure needs to be considered in the regulated fee as well (level 2 or 3). In goes without saying that a level 3 charger offers a great service than a level 2 therefore it makes sense to charge a higher fee for such service.

2.0 Reference: Exhibit C3-2, page 4 (Issues #6 and #7)

2.1 In Drive Energy's view, what specific conditions and/or restrictions should be placed on utility providers seeking to get into providing EV charging stations?

- 2.1.1 It would be at the providers' discretion to set its own fees. However, BCUC should adopt a policy / regulation to include a cap rate that cannot be exceeded to take advantage of customers especially since we are in a province where energy providers enjoy a monopoly / oligopoly market situation.

2.2 Should utility providers be required to set EV charging rates that reflect what the private market would charge or rates that recover their cost of providing EV charging stations (where the later may be lower due to a lower cost of capital)?

- 2.2.1 If so, please explain how Drive Energy envisions the Commission setting this rate based on what a private market would charge in the absence of such a market here in British Columbia?
 - 2.2.1. There are many examples that could be taken from other countries to calculate such rates considering cost of energy here in BC compared to what is being paid in other jurisdiction with higher energy rates. Suggested rates have to consider one important factor especially from an utility standpoint: It has to be appealing enough compared to a gasoline car. If the charging rates are such that it matches gas prices, the EV lost it's financial advantage unless drivers charge at home 100% of the time. I would suggest to touch base with the Norway Ministry of Climate or Christina Bu the Norwegian EV Association who would have more details on how it's been done in Norway. I'd be happy to privately provide contact information upon request.