

June 19th, 2018

Patrick Wruck
Commission Secretary
BC Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

**Re: Commission Inquiry into the Regulation of Electric Vehicle Charging Service ~ Project No.1598941
BrightSide Solutions Comments re Scope of Enquiry – Appendix A To Exhibit A34**

Dear Mr. Wruck:

Thank you for the opportunity to review the draft expanded scope for the enquiry. I would like to submit one additional suggestion regarding the expanded scope. I believe the enquiry should specifically address what charging applications will be addressed through the enquiry. At present the focus is on light duty vehicles and the various alternative methods for charging them. I would suggest that the scope should include all EV transportation applications. The regulatory structure should consider not just light duty vehicles but a host of other current and emerging applications including the following:

1. Charging of hybrid vessels such as ferries
2. Charging of fleets of utility vehicles such as lift trucks and golf carts
3. Supply of electricity for mobile port cranes
4. Shore power supply to ships in port
5. Charging solutions for heavy duty vehicles such as trucks and buses

In addition, the related government policy issue of ownership of Low Carbon Fuel Requirement Regulation credits for these applications needs to be addressed. As submitted in my earlier evidence, the incentive mechanism of LCFRR credits is not working with respect to electricity supply to these uses and this policy measure could help emerging applications in these areas by providing a business case for investments that would encourage greater use of electricity as a low carbon fuel.

Sincerely yours,
BrightSide Solutions

Mark Grist
President