

August 1, 2018

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

Dear BC Utilities Commission,

Please consider this letter the Electrical Contractors Association of British Columbia's (ECABC) 'Intervener written final argument' for Project No. 1598941.

ECABC does not have a particular perspective on whether the operators of electric vehicle charging infrastructure are public utilities or privately owned, or the specific rates that future operators will be permitted to charge end users.

On behalf of our membership, which includes the contractors responsible for the installation and maintenance of EV charging stations, there are some important factors we want to strongly encourage the BCUC and governments to consider.

- 1) All individuals installing and maintaining electric vehicle charging stations moving forward must have the appropriate level of training and certification to do this work. The current gold standard in North America is the Electric Vehicle Infrastructure Training Program (EVITP), which has certified more than 3,000 electricians in Canada and the United States, including here in B.C. To ensure public safety, and the protection of workers, anyone working on an EV charging station should be required to have this certification.
- 2) The final financial model for EV charging stations recommended by the BCUC, or a level of government determined to have jurisdiction over the matter, should consider the real costs of purchasing and installing EV charging infrastructure. Earlier this year, the City of Vancouver announced they are considering for all new residential buildings to have the capacity to install the same number of EV charging stations as parking spaces. This is good public policy, but there were misleading statements in the media after the announcement that each charging station would also cost a few hundred dollars. Based on our experience, that estimate is far too low and does not accurately factor in the variety of EV charging stations (and their price points), or the cost of installation. Operators of EV charging infrastructure should be permitted to charge an appropriate amount to fully recoup the cost of equipment purchase, installation and maintenance.
- 3) ECABC encourages all levels of government, BC Hydro, and the BCUC to work collaboratively to ensure British Columbia is fully prepared to embrace the electrification of our transportation network. EV charging infrastructure is a visible part of the equation, but needs to be supported with an adequate clean energy supply, transmission capacity to handle the increased load, and a system to responsibly manage the disposal and recycling of associated batteries.



Electrical Contractors Association of British Columbia

Electrical contractors look forward to continuing to play a pivotal role in building British Columbia's electrified transportation network.

Should you have any questions or require additional information, please don't hesitate to contact me directly at dcahill@eca.bc.ca or (604) 294-4123.

Sincerely,

A handwritten signature in black ink that reads "Deborah Cahill". The signature is written in a cursive, flowing style.

Deborah Cahill
President, Electrical Contractors Association of British Columbia