

**Vancouver Electric Vehicle Association (VEVA)
Final Argument**

**BCUC Regulation of Electric Vehicle Charging Service Inquiry
Phase 1**

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Vancouver Electric Vehicle Association (VEVA) is filing this Final Argument further to Commission Order G-119-18 dated 4 July 2018¹, which confirmed the Panel's determination to adopt a phased approach to its Inquiry into the Regulation of Electric Vehicle Charging Service.

SCOPE of FINAL ARGUMENT

VEVA's Final Argument for Phase I will address the following issues:

- **Do the words "for compensation" in the definition of public utility mean that a person who does not expressly require customers to pay for charging services but instead recovers the cost of charging from other services provided to the customers is a "public utility"?**
- **Should entities not otherwise public utilities supplying electricity to EV end users be regulated at all.**
- **Inasmuch as public utilities such as BC Hydro and FBC to participate in the EV market as owners or operators of EV charging stations, clarity is needed on whether BC Hydro and FBC are permitted to invest in EV charging stations as a prescribed undertaking under section 18 of the *Clean Energy Act* and section 4 of the GGRR.**

The scope of VEVA's Final Argument for Phase I relies upon and reflects the Panel's directions that it "...is not precluding any remaining scope items from consideration in the second or future phase of the Inquiry".²

¹ Exhibit A-35, PDF 9, section 3.0.

² Exhibit A-35, PDF 10, second paragraph.

VEVA's Final Argument for Phase 1 is also guided by the Panel's invitation to provide arguments, including those related to the potential merits and implications, on the following straw man regulatory framework:

"Entities not otherwise public utilities will, with respect to the provision of electric vehicle charging services, be exempt from Part 3 of the UCA except for sections 25, 26, 38, 42, 43, 38 44, and 49. Entities that are otherwise public utilities may apply for BCUC approval to provide regulated EV charging services."

As noted by the Commission in Order G-119-18 the potential framework quoted above is similar to the exemption granted by the Commission under Order G-71-16 relating to the Bakerview EcoDairy Ltd. (EcoDairy) application for an exemption to Part 3 of the UCA for EV charging service providers.³ That precedent effectively exempts an entity that is not otherwise a public utility that owns or operates EV charging stations for compensation from regulatory oversight for matters including certificates of public convenience and necessity, expenditure schedules, and rate setting.

The Panel also invited Final Argument on the following:

- 1. The legal interpretation regarding the "for compensation" wording within the definition of a public utility under the UCA.**
- 2. Interpretation of section 18 of the *Clean Energy Act* and section 4 of the GGRR as a prescribed undertaking, thereby enabling existing public utilities such as BC Hydro and FBC to provide EV charging services with the inclusion of EV charging stations in their regulated rate base.**

Finally, the Panel invited Intervener arguments on any additional priority issues for the Panel's consideration in the first phase of the Inquiry's report, currently estimated to be issued in October 2018 after Phase I Final Arguments and Reply Arguments are concluded and considered. The Panel's findings may lead to making recommendations for a Ministerial Order for certain exemptions from the *UCA*.

³ <http://www.bcuc.com/ApplicationView.aspx?ApplicationId=524>

ISSUE NO. 1

Do the words "for compensation" in the definition of public utility mean that a person who does not expressly require customers to pay for charging services but instead recovers the cost of charging from other services provided to the customers is a "public utility"?

The legal interpretation regarding the "for compensation" wording within the definition of a public utility under the UCA.

Section 1 of the UCA includes this definition:

" "compensation" means a rate, remuneration, gain or reward of any kind paid, payable, promised, demanded, received or expected, directly *or indirectly*, and includes a promise or undertaking by a public utility to provide service as consideration for, or as part of, a proposal or contract to dispose of land or any interest in it;" (emphasis added)

The words "for compensation" in the definition of public utility in the *UCA* create an expectation that a person who does not expressly require customers to pay for charging services but instead recovers the cost of charging from other services provided to the customers likely will be considered a "public utility" within the meaning of the *UCA*. The inclusion of "indirectly" certainly makes clear that the mere absence of expressly requiring customers to pay for charging services will not alone be sufficient to avoid falling within the definition.

One Intervener has suggested that the definition of public utility is not clear in the *UCA* and provided an example that if a mall owner installs EV charging stations and provides the free charging service, somebody has had to pay for the capital and electricity costs.⁴ That concern raises the question whether the definition of "for compensation" is likely to effectively and fairly capture all services that appear to be free, but actually are not. For example, some workplaces may provide either "free" EV charging, but may treat that service as a taxable benefit. Another example would be EV charging in some parking lots that require payment of a fee only for hourly parking but don't include any fee expressly for the charging service.

⁴ Transcript Volume 9, CEABC, pp. 668-669.

VEVA submits that such difficulty determining whether EV charging stations are being provided “for compensation” or not is likely to increase (i.e. become more difficult) rather than decrease as time passes. The current diversity among providers of EV charging stations (e.g. traditional utilities, multi-unit residential buildings or MURBs, office buildings, vehicle manufacturers, cities/municipalities, airports, retail locations, etc.) is likely to broaden before it potentially narrows due to possible industry consolidation. Current providers of EV charging stations may be joined by any number of new entrants that may include: fast-food chains, community service clubs, neighborhood associations, recreational complexes, campgrounds/RV parks, small scale (e.g. a single EV charging station) entrepreneurs, gasoline stations, etc. Each new type or category of EV charging station provider would add more and more complexity and require increased effort to determine whether each charging station was “for compensation” or not.

The possible permutations of “for compensation” seem certain to expand even further as opportunities for licensing, leasing, partnering, sponsoring, advertising, freemium pricing, co-op memberships and other service models are tested and refined. For example, one can envision an EV charging station operator (party #1) leasing charging station equipment from a manufacturer (party #2), receiving revenue from an advertiser (party #3) for branding and advertising on the charging station, receiving additional revenue and/or value from a private property owner (party #4) on whose land the charging station is installed, and expressly offering free charging service to EV drivers. As another example, consider the establishment of a co-op network of charging stations in which members purchase an annual membership that entitles them to charging of EVs at any co-op station.

If “for compensation” was determined on the basis of ***expressly requiring*** customers to pay for use of an EV charging station, such classification could be easily avoided by vague wording on signage (e.g. “payment is voluntary”), inviting suggested “donations” per unit of time or energy, characterizing the provided service as something other than EV charging (e.g. “patrons may wish to use complimentary EV charging services while they enjoy their paid electronically-monitored parking space) or any number of other dodges or schemes.

VEVA submits that leaving regulation of EV charging stations to be determined by the definition of “for compensation” invites abuse and avoidance and likely would be effectively unenforceable in practical terms. In VEVA’s view the debate as to whether “for compensation” should be a determining factor in Commission regulation of an EV charging station is easily settled. “For compensation” is an unhelpful and inappropriate criterion for that important purpose.

A narrow definition of “for compensation” is not the answer, because it would give rise to many fairness issues regarding who/what falls within or outside of the definition. For example, the language on the EV charging station signage could be determinative in attracting or avoiding Commission regulation.

On the other hand, it seems inconceivable that a more robust definition could be crafted with sufficient precision to provide a fair, practical, effective and ultimately enforceable criterion for determining whether or not a particular EV charging station should fall under Commission regulation. Even if a workable definition or legal interpretation could be achieved it may well take so long to do so that it would frustrate the necessary urgency of providing a broad and reliable network of EV charging stations. Further, if the presence or absence of Commission regulation of EV charging stations turned entirely on the definition of “for compensation”, no definition would seem sufficiently durable to anticipate every commercial or other arrangement that could be employed to avoid or defeat it. Whatever the definition or legal interpretation of “for compensation”, the apparently infinite permutations of charging station operators, charging equipment owners, property owners, advertisers, etc. and the commercial or legal relationships between them as well as with the EV drivers using the charging stations would seem to offer more than ample opportunities to avoid regulation simply by structuring arrangements to fall outside the definition or legal interpretation of “for compensation”.

VEVA expects that an enormous amount of effort and time could be expended in a futile attempt to seek a definition or legal interpretation that would effectively and reliably delineate whether a particular charging station was or wasn’t subject to Commission regulation. Even if that objective was achievable, and VEVA submits that it is not, application and enforcement of that definition or interpretation would consume countless resources of the Commission, parties and the courts.

In light of the acknowledged time pressures to move forward with enabling the establishment of a broad, reliable EV charging station network, VEVA urges the Commission to forego attempts to embark on an elusive and perhaps impossible pursuit of an ideal definition or legal interpretation of “for compensation” relating to EV charging stations and instead recommend that EV charging stations be specifically exempted from application of that term in all applicable sections of the *UCA*.

ISSUE NO. 2

Should entities not otherwise public utilities supplying electricity to EV end users be regulated at all.

The Commission invited discussion of a straw man regulatory framework as follows:

Entities not otherwise public utilities will, with respect to the provision of electric vehicle charging services, be exempt from Part 3 of the UCA except for sections 25, 26, 38, 42, 43⁵, 44, and 49. Entities that are otherwise public utilities may apply for BCUC approval to provide regulated EV charging services.

The straw man regulatory framework noted by the Commission reflects the same exemption, and exceptions to that exemption (other than adding section 26), as ordered in the Bakerview EcoDairy proceeding. VEVA is generally opposed to an approach that would continue to apply sections 25, 26, 38, 42, 43, 44 and 49 notwithstanding an exemption from the rest of Part 3 of the UCA. VEVA submits that the cumulative impacts of applying those sections of the UCA to entities not otherwise public utilities would increase⁶ regulatory burdens and deter EV charging development and investment. Accordingly, VEVA submits that the Commission should forego regulation of entities not otherwise public utilities supplying electricity to EV end users and recommend issuance of an exemption from all sections of Part 3 of the UCA.

VEVA's suggested approach may be concisely expressed in a modified straw man regulatory framework as follows:

Entities not otherwise public utilities will, with respect to the provision of electric vehicle charging services, be exempt from all sections of Part 3 of the UCA. Entities that are otherwise public utilities may apply for BCUC approval to provide regulated EV charging services.

⁵ Excluding 43(1)(b)(ii) where a public utility must provide to the BCUC an annual report regarding demand-side measures.

⁶ EV charging station operators and/or owners bear other existing regulatory burdens, apart from any that the Commission may impose.

Commission’s Straw Man Regulatory Framework

The sections of the UCA noted as exceptions from the Commission’s straw man exemption are reproduced below, together with VEVA’s section-specific concerns.

Commission may order improved service

25 If the commission, after a hearing held on its own motion or on complaint, finds that the service of a public utility is unreasonable, unsafe, inadequate or unreasonably discriminatory, the commission must

- (a) determine what is reasonable, safe, adequate and fair service, and
- (b) order the utility to provide it.

VEVA notes that in the context of EV charging stations it is not all clear what may constitute “unreasonable” service. One may expect that if section 25 applies to entities not otherwise public utilities then the Commission may receive “unreasonable service” complaints including but not limited to: hours of operation; color/size/appearance of charging equipment; speed of charging; lack of enforced turnover (e.g. disconnecting and leaving when charging is complete); pricing; and many other concerns. It seems unlikely that the Commission’s resources could address all possible complaints, or that doing so would provide a net benefit to the public.

Safety is definitely an important and legitimate concern, but VEVA is not aware of significant safety concerns with EV chargers that have arisen in the current absence of Commission regulation. Manufacturers of EV charging stations/equipment are already strongly incented to make safety a priority – for the public confidence crucial to their commercial success, to satisfy other regulators and obligations, and to avoid liability exposure.

In addition, there are other bodies that oversee safety and establish standards for that purpose. For example, the City of Vancouver’s Electrical By-law No. 5563 regulates the safety, installation, operation and maintenance of electrical equipment in the City of Vancouver - including EV charging stations. This By-law incorporates the Canadian Electrical Code, Part 1, 2nd Edition, Safety Standard for Electrical Installations.⁷ VEVA expects that other cities and/or municipalities have similar bylaws or would soon enact them. MEMPR also discusses safety standards that

⁷ Exhibit C5-5, CoV Response to ChargePoint IR 3.3, p. 4.

originate from authorities other than the Commission, including reference to the *Safety Standards Act*.⁸

Perceived “inadequacy” of EV charging services seems likely to give rise to other questionable complaints. Not fast enough. Not cheap enough. Not easy enough. Not convenient enough. Not enough chargers at each station. Not enough stations. All of which would probably result in far more than enough incremental demands on finite Commission resources.

Potential complaints of “unfair” or “unreasonably discriminatory” service appear to be the most problematic. Application of section 25 appears likely to lead to placing the Commission in the center of disputes such as:

- It is unfair to me that YVR Airport is providing a free service to EV drivers at my expense;
- I am being discriminated against by not being permitted to charge my EV at the apartment building down the street from my house; or
- It’s not fair that I can’t charge my EV in Company X’s parking lot just because I am not their employee.

It is important to note that these few illustrative examples aren’t purely hypothetical, as they each reflect current situations in which some EV charging stations are accessible only to a specific class of driver (e.g. EV operator, tenant or strata owner, employee, etc.).

Commission may set standards

- 26** After a hearing held on the commission's own motion or on complaint, the commission may do one or more of the following:
- (a) determine and set just and reasonable standards, classifications, rules, practices or service to be used by a public utility;
 - (b) determine and set adequate and reasonable standards for measuring quantity, quality, pressure, initial voltage or other conditions of supplying service;
 - (c) prescribe reasonable regulations for examining, testing or measuring a service;
 - (d) establish or approve reasonable standards for accuracy of meters and other measurement appliances;
 - (e) provide for the examination and testing of appliances used to measure a service of a utility.

⁸ Exhibit C19-2, MEMPR Evidence, p.7.

VEVA's concern with the application of section 26 to entities not otherwise utilities, with respect to the provision of electric vehicle charging services, relates primarily to the extent of the Commission's expertise and the appropriate utilization of its finite resources. The record in this Inquiry has already established that measurement standards for EV charging stations will need to be issued by Measurement Canada. Other authorities also currently govern aspects of reliability and service (e.g. electrical code establishes standards, Consumer Services BC can handle complaints, certain municipal bylaws apply to operation and installation, etc.). Beyond that, individual equipment manufacturers and the EV charging industry collectively are strongly incented to encourage much broader EV adoption – key to their commercial success – by working together to build public confidence in the standards, measurements and practices used for EV charging.

Public utility must provide service

- 38** A public utility must
- (a) provide, and
 - (b) maintain its property and equipment in a condition to enable it to provide, a service to the public that the commission considers is in all respects adequate, safe, efficient, just and reasonable.

VEVA submits that its above submissions regarding adequacy and safety also apply in the context of section 38. The qualifying phrase “to the public” appears ill-suited for application to EV charging, as many existing EV charging stations are intended to be limited to use by qualifying classes only (e.g. employees, tenants or strata owners, patrons of a business, club members, etc.) rather than all members of the general public. Creating an imperative to serve all members of the public would upset many of the existing EV charging station arrangements.

The prescriptive language of section 38 creates an obligation to serve that seems inappropriate for EV charging service provided by a broad and diverse collection of market participants. The “obligation to serve” concept inherent in section 38 was developed in the context of large monopoly utilities providing an essential service (e.g. electricity for heating or cooling) that was not available from other sources. Utilities traditionally assumed this obligation to serve in exchange for an exclusive monopoly franchise, which is clearly not the case in current or anticipated EV charging services in BC.

It is counter-productive to the development of a functioning network of EV charging stations to prescribe that an EV charging station **must** provide service. Although it may seem counter-intuitive, a prohibition on **exiting** the market (due to the prescribed obligation to serve) is likely to discourage some providers from **entering** the EV charging market.

VEVA submits that if section 38 is applied to entities not otherwise utilities, with respect to the provision of electric vehicle charging services, “just and reasonable” will be interpreted primarily as relating to the rates for charging services at EV charging stations. VEVA supports permitting the market to set rates for EV charging. The very nature of an EV as a mode of transportation it enables drivers to travel to the charging station of their choice, the locations of which will be determined primarily by demand and not by any natural monopoly. In the absence of a natural monopoly, regulated rates would seem likely to deter the development of EV charging stations.

Duty to obey orders

42 A public utility must obey the lawful orders of the commission made under this Act for its business or service and must do all things necessary to secure observance of those orders by its officers, agents and employees.

VEVA opposes application of section 42 (as an exception to an exemption from Part 3 of the *UCA*) to entities not otherwise utilities, with respect to the provision of electric vehicle charging services, as it would create administrative burdens for both EV charging station operators/owners and the Commission, without providing a demonstrated net benefit to the public. In the event that an exemption from the rest of Part 3 of the *UCA* is granted, it is unclear what value might be achieved by retaining application of section 42.

Duty to provide information

43 (1) A public utility must, for the purposes of this Act,
(a) answer specifically all questions of the commission, and
(b) provide to the commission
(i) the information the commission requires, and
(ii) a report, submitted annually and in the manner the commission requires, regarding the demand-side measures taken by the public

utility during the period addressed by the report, and the effectiveness of those measures.⁹

(1.1) [Repealed 2010-22-64.]

- (2) A public utility that receives from the commission any form of return must fully and correctly answer each question in the return and deliver it to the commission.
- (3) On request by the commission, a public utility must deliver to the commission
 - (a) all profiles, contracts, reports of engineers, accounts and records in its possession or control relating in any way to its property or service or affecting its business, or verified copies of them, and
 - (b) complete inventories of the utility's property in the form the commission directs.
- (4) On request by the commission, a public utility must file with the commission a statement in writing setting out the name, title of office, post office address and the authority, powers and duties of
 - (a) every member of the board of directors and the executive committee,
 - (b) every trustee, superintendent, chief or head of construction or operation, or of any department, branch, division or line of construction or operation, and
 - (c) other officers of the utility.
- (5) The statement required under subsection (4) must be filed in a form that discloses the source and origin of each administrative act, rule, decision, order or other action of the utility.

VEVA opposes application of section 43 (as an exception to an exemption from Part 3 of the *UCA*) to entities not otherwise utilities, with respect to the provision of electric vehicle charging services, as it would create administrative burdens for both EV charging station operators/owners and the Commission, without providing a demonstrated net benefit to the public.

⁹ Note that the Commission has expressly excluded from the proposed straw man regulatory framework the application of section 43(1)(b)(ii) where a public utility must provide to the BCUC an annual report regarding demand-side measures.

Duty to keep records

- 44** (1) A public utility must have in British Columbia an office in which it must keep all accounts and records required by the commission to be kept in British Columbia.
- (2) A public utility must not remove or permit to be removed from British Columbia an account or record required to be kept under subsection (1), except on conditions specified by the commission.

VEVA opposes application of section 44 to entities not otherwise public utilities, with respect to the provision of electric vehicle charging services, as it adds a significant regulatory burden on existing and prospective EV charging station operators and would draw on Commission resources for oversight, but without providing any clear or compelling public benefit.

Accounts and reports

- 49** The commission may, by order, require every public utility to do one or more of the following:
- (a) keep the records and accounts of the conduct of the utility's business that the commission may specify, and for public utilities of the same class, adopt a uniform system of accounting specified by the commission;
 - (b) provide, at the times and in the form and manner the commission specifies, a detailed report of finances and operations, verified as specified;
 - (c) file with the commission, at the times and in the form and manner the commission specifies, a report of every accident occurring to or on the plant, equipment or other property of the utility, if the accident is of such nature as to endanger the safety, health or property of any person;
 - (d) obtain from a board, tribunal, municipal or other body or official having jurisdiction or authority, permission, if necessary, to undertake or carry on a work or service ordered by the commission to be undertaken or carried on that is contingent on the permission.

VEVA opposes application of section 49 to entities not otherwise public utilities, with respect to the provision of electric vehicle charging services, as it adds a significant regulatory burden on existing and prospective EV charging station operators and would draw on Commission resources for oversight, but without providing any clear or compelling public benefit.

ISSUE NO. 3

Inasmuch as public utilities such as BC Hydro and FBC to participate in the EV market as owners or operators of EV charging stations, clarity is needed on whether BC Hydro and FBC are permitted to invest in EV charging stations as a prescribed undertaking under section 18 of the *Clean Energy Act* and section 4 of the GRR.

Interpretation of section 18 of the *Clean Energy Act* and section 4 of the GRR as a prescribed undertaking, thereby enabling existing public utilities such as BC Hydro and FBC to provide EV charging services with the inclusion of EV charging stations in their regulated rate base.

Clean Energy Act section 18 states:

Greenhouse gas reduction

- 18** (1) In this section, "**prescribed undertaking**" means a project, program, contract or expenditure that is in a class of projects, programs, contracts or expenditures prescribed for the purpose of reducing greenhouse gas emissions in British Columbia.
- (2) In setting rates under the [Utilities Commission Act](#) for a public utility carrying out a prescribed undertaking, the commission must set rates that allow the public utility to collect sufficient revenue in each fiscal year to enable it to recover its costs incurred with respect to the prescribed undertaking.
- (3) The commission must not exercise a power under the [Utilities Commission Act](#) in a way that would directly or indirectly prevent a public utility referred to in subsection (2) from carrying out a prescribed undertaking.
- (4) A public utility referred to in subsection (2) must submit to the minister, on the minister's request, a report respecting the prescribed undertaking.
- (5) A report to be submitted under subsection (4) must include the information the minister specifies and be submitted in the form and by the time the minister specifies.

VEVA supports the development and establishment of an extensive and reliable network of EV charging stations and supports BC Hydro and FBC participating in the EV charging market, as important pieces for "kickstarting" an extensive and reliable EV charging network. VEVA assumes that such participation by BC Hydro or FBC would not include any type of exclusive monopoly franchise related to EV charging.

BC Hydro in a response to an Information Request stated:

“The Greenhouse Gas Reduction (Clean Energy) Regulation (GHG Regulation), as amended, is one of the enactments under the *Clean Energy Act* that under certain circumstances provides indirectly for EV charging services. The GHG Regulation defines classes of undertakings that a public utility may carry out. To the extent a public utility’s undertaking falls within one of the prescribed classes, the Commission must allow the utility to recover the costs of the undertaking in rates and may not prevent a public utility (directly or indirectly) from carrying out the undertaking (sections 18(2) and (3), respectively, of the *Clean Energy Act*). Paragraphs 4(3)(a)(ii) and 4(3)(c) are two provisions of the GHG Regulation that indirectly provide for public utility undertakings that may be in relation to the provision of EV charging services.”¹⁰

VEVA observes that the interpretation, application and impacts of *Clean Energy Act* section 18 and GGRR section 4 are heavily fact-dependent and would most appropriately be considered in the context of specific applications by BC Hydro or FBC that identify the specific project, program, contract or expenditure in question and provide a rationale for why should or shouldn’t be treated as a “prescribed undertaking”.

VEVA agrees with and supports the portion of FBC’s evidence stating:

“The development of EV charging infrastructure contributes toward the achievement of the provincial energy and climate action objectives. Deployment of EV charging stations promotes the use of EVs in BC and supports the use of clean or renewable resources, reduces BC GHG emissions, encourages individuals to switch to lower GHG emission fuel sources, encourages communities to reduce GHG emissions and use energy efficiently, and encourages economic development and the creation and retention of jobs.”¹¹
(emphasis added)

VEVA anticipates that it will make further submissions in Reply to BC Hydro’s and FBC’s Final Arguments in respect of *Clean Energy Act* and GGRR issues.

ADDITIONAL PRIORITY ITEMS FOR PHASE I CONSIDERATION

VEVA does not propose any additional priority items for consideration by the Commission in Phase I of the Inquiry.

¹⁰ Exhibit C1-4, BC Hydro Response to D. Flintoff IR 1.2.1.

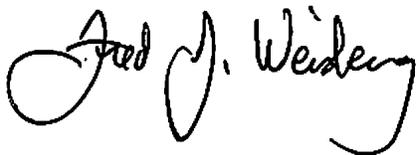
¹¹ Exhibit C12-2, FBC Written Evidence, PDF 15.

SUGGESTED FINDINGS and RECOMMENDATIONS FOR COMMISSION'S REPORT

VEVA respectfully suggests that the Commission consider:

- Finding that the Commission has the jurisdiction to regulate third-party EV charging stations (i.e. the first of ChargePoint's three "threshold issues")¹²;
- Finding that the Commission should not exercise that jurisdiction with respect to entities not otherwise public utilities, with respect to the provision of electric vehicle charging services, but rather should forebear from regulation (i.e. the second of ChargePoint's three "threshold issues");
- Finding that having determined to forebear from regulation of entities not otherwise public utilities, with respect to the provision of electric vehicle charging services, it is unnecessary to consider what form of regulation the Commission should apply to EV charging stations owned/operated by parties that are not established, traditional utilities (i.e. the second of ChargePoint's three "threshold issues");
- Recommending issuance of a Ministerial Order for an exemption for all entities not otherwise public utilities, with respect to the provision of electric vehicle charging services, from all sections of Part 3 of the *UCA*.

ALL OF WHICH IS RESPECTFULLY SUBMITTED AUGUST 1, 2018



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¹² ChargePoint identified three "threshold issues" identified at the Procedural Conference held on June 27, 2018, which were noted by the Commission in Exhibit A-35, PDF 6, section 2.1.