

Date Submitted: January 02, 2019

Proceeding name: BCUC Regulation of Electric Vehicle Charging Service Inquiry-Phase 2

Participant contact information

Organization or individual name: Alliance for Transportation Electrification

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For organizations only - representative contact information

Name: Philip Jones

Organization (if different from above): Alliance for Transportation Electrification

City: Seattle, Washington

Province: Other

Email: phil@evtransportationalliance.org

Phone number: 2063355451

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

The Alliance for Transportation Electrification is a non-profit trade association, based in Seattle, WA, that advocates for an acceleration of EV infrastructure before State Public utility Commissions, state agencies, Provincial Commissions and Tribunals across North America. Our goals broadly defined are: to accelerate the

deployment of EVSE and infrastructure and fill the infrastructure gap; to provide for a strong and robust utility role as a necessary catalyst to transform and scale up this nascent market; and to argue for strong open protocols and standards for interoperability among multiple network management systems. After engaging with many State Commission in the U.S., we wish to engage in these issues in British Columbia and other provinces since many of the market development, policy, and regulatory issues are similar. Some of our members are located in Western states that are members of the Western Climate Initiative (WCI) as well, and familiar with the GHG reduction targets and environmental issues that are present in British Columbia.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

We are active in over 20 State Commissions and state-based proceedings in the U.S. on EV issues. Our members are broadly based, and include not only investor-owned and consumer-owned utilities, but also auto OEM's, EVSE firms, and certain engineering/consulting firms. Through our engagement in many jurisdictions, we have learned many "best practices" as well as "lessons learned" both in terms of what worked in early pilot programs of regulated utilities (as well as what did not achieve its goals), as well as the experience of non-utility service providers. We believe that we can add value and perspectives to the questions posed by the Commission in the Phase 2 Inquiry, ranging from the regulatory framework for non-exempt public utilities and the role of non-utility service providers and vendors.

Please list the key issues you intend to address in the proceeding:

1. Overall market development issues, including the ongoing role of the non-exempt public utility that transcends "kick starting" the market. Discussing the pro's and con's of the various market models; 2. Range of market projections for EV adoption, and the extent of the "EV infrastructure gap" in BC; 3. The use of the portfolio approach for different types of charging infrastructure to be deployed -- from residential to DCFC both in urban centers and intercity corridors; 4. Regulatory issues around EV capital and O&M costs, depreciation, and potential stranded assets

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: No

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: No

If yes, please provide your username: