

September 30, 2020

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC
V6Z 2N3

Attention: Ms. Marija Tresoglavic, Acting Commission Secretary

Dear Ms. Tresoglavic:

**Re: FortisBC Inc. (FBC)
Project No. 1598940
Application for Approval of Rate Design and Rates for Electric Vehicle Direct**

The time-based pricing structure proposed by FortisBC Inc. (FBC) in their application for Approval of a Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service is highly discriminatory and should not be approved by the British Columbia Utilities Commission (BCUC).

The pricing structure is discriminatory because different vehicles charge at different rates depending on the capacity of the batteries on the vehicle and the electrical characteristics of the onboard charging system. Therefore, different customers will receive significantly different amounts of electricity during identical durations of charging and will therefore be charged different rates for the amount of electricity actually received.

The differences in charging rates can be substantial. For my electric vehicle, the charging rate typically starts out at approximately 120A at low state of battery charge and drops off to approximately 10A when the batteries are at a higher state of charge. Under FBC's existing and proposed rate structure I would get charged the same amount of money for a minute of charging at 120A as a minute of charging at 10A. An electric vehicle with a larger battery capacity would be able to sustain the 120A charge for a longer period of time than my car and would therefore receive substantially more electricity than I would for the same amount of money.

Section 39 of the Utilities Commission Act requires that public utilities provide suitable service without undue discrimination. The proposed rate structure clearly does not comply with that requirement.

Rather than accept a discriminatory pricing structure, the BCUC should require FBC to either: (i) work with Measurement Canada to get interim approval to bill by the kW-h, or(ii) install existing power meter technology that is compliant with Measurement Canada requirements.

If necessary, the BC government should lobby the Canadian federal government and Measurement Canada on behalf of FBC to obtain interim approval to use existing metering in FBC's charging stations or expedite approval.

Sincerely,

Ryan Cownden