

05 November 2020

VIA E-FILING

Marija Tresoglavic
Acting Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7311.310

Dear Ms. Tresoglavic,

**Re: FortisBC Inc. Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service Application ~ Project No. 1598940
BCOAPO Information Request No. 1 to FortisBC Inc. (FBC)**

We represent the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and the Tenant Resource and Advisory Centre, known collectively in this process as "BCOAPO et al."

Enclosed please find the BCOAPO's Information Request No. 1 to FBC with respect to the above-noted matter.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by:

Leigha Worth
Executive Director | General Counsel

Encl.

REQUESTOR NAME: **BCOAPO**
INFORMATION REQUEST ROUND NO: **#1**
TO: **FortisBC Inc. (FBC)**
DATE: **November 5, 2020**
PROJECT NO: **1598940**
APPLICATION NAME: **Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service**

1.0 Reference: Exhibit B-5, page 3 (lines 4-6); page 10 (lines 7-10);

page 22 (lines 1-13) and Appendix E, page 2 (50 & 100 kW)

- 1.1 How many stations are on the sites FBC currently owns in New Denver and Nakusp that will be transferred to BCH?
- 1.2 How many stations are on the sites BCH currently owns in Keremeos and Princeton that will be transferred to FBC?
- 1.3 With respect to the two sites currently owned by BCH, does BCH currently own the land associated with the sites or are sites leased?
 - 1.3.1 If owned by BCH, is ownership of the land being transferred to FBC and, if so, please reconcile with the statement on page 17 that FBC's sites are all leased.
- 1.4 Are all of the stations at all four sites 50 kW stations?
- 1.5 Why is this "exchange" of sites taking place?
- 1.6 Does Table 4-1 include the cost of FBC stations that will be transferred to BCH or the cost of the stations that BCH will transfer to FBC?
- 1.7 Please provide a schedule that sets out, as of December 31, 2020, the (approximated) book value of: i) the FBC stations that will be stations that will be transferred to BCH and ii) the stations that BCH will transfer to FBC using the same format as in Table 4-1.
- 1.8 The schedules in Appendix E do not show any adjustments in rate base for this exchange of stations/sites. How is this exchange accounted for/treated in the Cost of Service and Financial Schedules?

2.0 Reference: Exhibit B-5, page 5 (lines 18-21)

- 2.1 Has the recovery of the actual/forecast costs associated with the regulatory process and approval of this Application that are currently being captured in the EV Charging Stations Rate Design and Tariff Application deferral account included in the cost of service analysis and proposed rate calculations set out in sections 3.2 and 3.3 of the current Application?

- 2.1.1 If yes, please indicate where in the Schedules provided in Appendix E these costs have been included?
- 2.1.2 If not, why not?
- 2.1.3 If not, please provide a revised cost of service analysis that includes the recovery of these costs over a five-year period starting in 2022. (Note: Please use an alternative amortization period if FBC feels five years is not appropriate and explain why)

3.0 Reference: Exhibit B-5, pages 7-8

Preamble: The Application states (page 8): *“FBC will own and operate the DCFC stations, which satisfies the criteria in section 5(2)(a) of the GGRR. FEI will contract FLO Services Inc. (FLO) to provide maintenance services and network management services. FLO will provide customer support services for EV drivers using the station, and will also be responsible for providing technical support for diagnosing and remedying any breakdowns or malfunctions of the DCFC stations.”* (Emphasis Added)

- 3.1 Why is it FEI (and not FBC) that is contracting with FLO Services Inc?
- 3.2 Does the fact that FEI is doing this contracting impact (increase) FEI’s annual charges to FBC for shared or other services?
 - 3.2.1 If not, why not?
 - 3.2.2 If yes, what is the estimated impact in 2022?
 - 3.2.3 If yes, please confirm that these “charges” have been included in the cost of service analysis and proposed rate calculations set out in sections 3.2 and 3.3 of the current Application and indicate where in the Appendix E schedules this is done.
- 3.3 Are there any aspects related to the annual operation and maintenance of the DCFC stations that FBC will carry out directly?
 - 3.3.1 If yes, what are they?
 - 3.3.2 If not, what is the basis for FBC’s claim that it operates the DCFC stations?

4.0 Exhibit B-5, pages 7-8

Preamble: The Application states: *“The existing 23 DCFC stations (16 sites) currently in operation, as well as the 17 planned stations (7 sites) in the Application meet the definition of an eligible charging station in Section 5(1) of the GGRR in that they are all: available for use 24 hours a day by any member of the public; do not require users to be members of a charging network, and are capable of charging electric vehicles of more than one make.”*

Drivers using FBC DCFC stations for EV recharging purposes will have two options for payment transactions with FBC:

1. Creating a membership with the FLO network and linking an appropriate means of payment (credit card, bank account) to that membership; or

2. Scanning a Quick Response Code (QR code) on the station with their mobile phone which will take the customer to a payment portal where they can enter their credit card details which will allow the station to be activated. Customers may also contact FLO's telephone customer support to establish a single use credit card transaction. The customer's credit card will be charged the appropriate amount once the charging session is complete."

- 4.1 Is there any fee (either fixed or per transaction) associated with FLO network membership?
- 4.2 Will FLO's telephone customer support be available 24/7 to accept calls from customers wanting service who do not have a FLO membership or a mobile phone with the capability to use the QR code?
- 4.3 Will customer's using either the QR Code or establishing payment through FLO's telephone customer support incur any additional cost for the transaction?
- 4.4 If customers do not have a FLO membership or a mobile phone will they be able to use the station and, if yes, how?

5.0 Reference: Exhibit B-5, pages 7-8

Preamble: The Application states: *"All FBC DCFC stations will be equipped with connectors supporting both CHAdeMO and Combined Charging System (CCS) connectors capable of charging electric vehicles of more than one make."*

- 5.1 What makes of electric vehicles will the FBC DCFC stations be able and not be able to charge?

6.0 Reference: Exhibit B-5, pages 7-11 and Appendix A

- 6.1 Please confirm that Table 2-1 sets out the number of charging sites (as opposed to stations) in each limited municipality.
- 6.2 Why is the 2016 Census (per Table 2-1 and 2-2) used to determine whether a station/site is located in a "limited" municipality? Is there not more recent data available; for example, from the municipalities themselves?
- 6.3 Do "eligible charging sites" (as the term is used and defined in Section 5 of the GGRR) include both sites owned by exempt and non-exempt utilities?
- 6.4 What is the basis for the exempt utility site count (current) and exempt utility site count (planned) values set out in Table 2-1?

- 6.5 Are the values set out in Table 2-1 for current and planned exempt utility site counts still valid? If not, please provide an update.
- 6.6 What is the status of the site in the limited municipality of Penticton that FBC indicated it planned on owning and operating beginning October 1, 2020 (page 9, lines 5-6)?
- 6.7 Section 5 of the GGRR states: “the public utility reasonably expects, on the date the public utility decides to construct or purchase an eligible charging station, that: (i) the station will come into operation by December 31, 2025, and (ii) if the station will be located in a limited municipality, the number of eligible charging sites in the municipality on the date the station will come into operation will not exceed the site limit for the municipality on that date”. Has FBC formally decided to construct/purchase a station/stations at the second site intended for Penticton?
 - 6.7.1 If yes, when was the “formal” decision made and by whom?
 - 6.7.2 If not, does FBC intend to update its assessment as to whether the second site will meet the requirements of the GGRR per Section 5 (2) prior to formally making this decision?

7.0 Reference: Exhibit B-5, page 9

Preamble: *The Application states: “While FBC expects all of its planned stations to come into operation prior to January 1, 2022, all of its charging stations (both current and planned) will be configured to use the OCPP. OCPP refers to a network communication protocol between DCFC stations and a charging station management system. FBC’s DCFC stations currently use a communication protocol referred to as the Open Network Protocol (ONP)- Intranetworking for communication between the stations and the charging station management system. However, FBC’s vendor AddEnergie is committed to achieving OCPP compliance by mid-2021 for all stations owned and operated by FBC”.*

- 7.1 Will the two stations at the two sites currently owned by BCH to be transferred to FBC also be configured to use the OCPP?

8.0 Reference: Exhibit B-5, pages 10-11

- 8.1 In Table 2-2, under the column titled “5(2)(b)(i)”, for Kelowna Airport there is a notation that there are two stations involved. Does this mean that there is only one station associated with each of the other dates in this column?
 - 8.1.1 If not, please provide a revised table that indicates the number of individual stations associated with each date.
- 8.2 In Table 2-2, how many of the stations at each site are 50 kW vs. 100 kW charging stations?

- 8.3 Is each “station” only capable of charging one vehicle at a time? If some/all stations can charge more than one vehicle at a time, please provide either a revised version Table 2-2 or include in the response to the preceding questions (if applicable) not only the station count and station kW associated with each date but also the number of vehicles that can simultaneously be charged and the overall maximum potential demand for the site.

9.0 Reference: Exhibit B-5, pages 10-11

- 9.1 What criteria does FBC use to decide where a charging site should be located, how many charging stations should be installed and whether the stations should be 50 kW or 100 kW?
- 9.2 Please demonstrate that each of the sites listed in Table 2-2 meets these criteria.

10.0 Reference: Exhibit B-5, pages 12 and 20

Preamble: The Application states (page 12):

“Sections 18(2) and 18(3) of the Clean Energy Act describes the BCUC’s role in the setting of rates related to prescribed undertakings:

(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.” (Emphasis added)

The Application also states (page 20): *“Due to the levelized nature of the rate, there will be some (early) years where the EV charging revenue will be less than the cost of service. In these years, all other FBC customers will bear the costs in excess of revenues. Conversely, in years where the charging revenue is greater than the cost of service, all other FBC customers will benefit from the excess of revenues.”*

- 10.1 Given that the CEA requires that the BCUC set rates related to prescribed undertakings that allow the public utility to collect sufficient revenue in each fiscal year to enable it to recover its costs, why is it appropriate to the EV charging revenue in the early years to be less than the cost of service?
- 10.2 Did FBC consider addressing the under-recovery of costs in the early years by establishing a regulatory/deferral account that would track the under recovery in the early years and then recover it in later years through the RS 96 rates?
- 10.2.1 If yes, please outline the pros and cons associated with such an approach and why it was rejected?

10.2.2 If not, discuss the pros and cons of such an approach as compared to the approach proposed by FBC.

11.0 Reference: Exhibit B-5, pages 10-11 and page 13

Preamble: The Application states (page 13): *“FBC has assumed consumption of 20 kWh per charge event based on historical kWh volumes per charge session at FBC’s existing stations. Based on historical usage patterns, 20 kWh corresponds to approximately 30 minutes of charging.”*

11.1 Please confirm that the 20 kWh per 30 minutes is based on a 50 kW station.

11.1.1 What is the assumed typical usage and length of charging event for a 100kW station and how were these values determined?

11.2 For each of the sites listed in Table 2-2, is the only electricity usage at a charging site the usage associated with the charging station(s) when it/they are in use or is there other usage as well such as security lighting or usage by the payment processing equipment?

11.3 How is the electricity usage at each site metered (i.e., is there a single meter for each site and/or does each station have a meter) and does the metered usage capture non-station usage (if there is any)?

11.4 Please provide a schedule that, for each of the sites with charging stations in-service for part/all of 2018, sets out for the year:

- i. the number of days the stations were in-service and their kW rating (Note: If there was more than one station and the days differ for each station, please report each separately),
- ii. the number of charging events,
- iii. the number of charging minutes,
- iv. the average number of charging minutes per event,
- v. the total kWh used,
- vi. the average maximum monthly demand,
- vii. the average kWh per charging event (based on (ii) and (iii)) for the site),
- viii. the overall (based on all sites) average kWh per event,
- ix. the number of charging events per day at the site, and
- x. the overall (based on all sites) average number of charging events per day.

11.4.1 As part of the response, please indicate whether the kWh reported includes all kWh usage at the site (i.e., usage for purposes other than actual charging events).

11.5 Please provide a schedule that, for each of the sites with charging stations in-service for part/all of 2019, sets out for the year:

- i. the number of days the stations were in-service and their kW rating (Note: If there was more than one station and the days differ for each station, please report each separately),
- ii. the number of charging events,
- iii. the number of charging minutes,
- iv. the average number of charging minutes per event,
- v. the total kWh used,
- vi. the average maximum monthly demand,
- vii. the average kWh per charging event (based on (ii) and (iii)) for the site),
- viii. the overall (based on all sites) average kWh per event,
- ix. the number of charging events per day at the site, and
- x. the overall (based on all sites) average number of charging events per day.

11.5.1 As part of the response, please indicate whether the kWh reported include all kWh usage at the site (i.e., usage for purposes other than only actual charging events).

11.6 Please provide a schedule that, for each of the sites with charging stations in-service for part/all of 2020, sets out for those months of the year where data is now available:

- i. the number of days the stations were in-service (Note: If there was more than one station and the days differ for each station, please report each separately),
- ii. the number of charging events,
- iii. the number of charging minutes,
- iv. the average number of charging minutes per event,
- v. the total kWh used,
- vi. the average maximum monthly demand,

- vii. the average kWh per charging event (based on (ii) and (iii)) for the site,
- viii. the overall (based on all sites) average kWh per event,
- ix. the number of charging events per day at the site, and
- x. the overall (based on all sites) average number of charging events per day.

11.6.1 As part of the response, please indicate whether the kWh reported include all kWh usage at the site (i.e., usage for purposes other than actual charging events).

12.0 Reference: Exhibit B-5, page 13 and Appendix E, Schedule 2

Preamble: The Application states (page 13): *“The usage at FBC’s EV stations are the minutes per year that EV customers will use the stations to charge their vehicles. As described below, FBC modeled EV charging usage by establishing a baseline using historical data and then applying growth rates based on third party analysis. To understand current use, FBC reviewed historical usage (in minutes) at existing FBC-owned DCFC stations across FBC’s service territory. Average usage was approximately 0.3 sessions (9 minutes) per station per day in 2018, and 0.7 sessions (21 minutes) per station per day in 2019. Data from 2020 was not included due to the impact of COVID-19 on EV charging patterns (i.e. fewer customers driving resulting in lower-than-anticipated DCFC usage compared to historical trends).”*

The Application further states (page 13): *“To estimate future usage of DCFC stations, FBC reviewed year-over-year projected growth rates of EV registrations in FBC’s service territory based on EV sales targets from the Province’s Zero Emissions Vehicles (ZEV) Act. FBC has assumed that the growth rate in EV registrations will be reflected in the growth rate of DCFC usage, which aligns with observations from 2018 and 2019 data.”*

- 12.1 What year was used as the baseline and what was the average usage attributed to a 50 kW station in that year (i.e., minutes per station per day)?
- 12.2 Given all of the existing stations are 50 kW, please indicate what baseline year and value was used for the 100 kW stations and how the baseline usage value was established.
- 12.3 Please provide the EV sales targets from the Province’s ZEV Act and explain how the targets were translated into year over year growth rates in DCFC usage (i.e., charging minutes per station) for the period 2019-2030 and provide the supporting calculations.
- 12.4 Please confirm that FBC is assuming that EV registration in its service territory will grow at the same rate as overall provincial registrations.

12.4.1 If confirmed, what is the basis for this assumption?

12.4.2 If not confirmed, what is the basis for assuming that the growth in provincial EV registrations will be reflected in the growth in DCFC usage in its service territory?

12.5 Please provide schedules that set out the calculation of:

- i. The number of charging minutes in each year from 2020 to 2030 for 50 kW stations (per Appendix E, Schedule 2, line 11) based on the number of stations and the assumed number of charging minutes per station.
- ii. The number of charging minutes in each year from 2020 to 2030 for 100 kW stations (per Appendix E, Schedule 2, line 11) based on the number of stations and the assumed number of charging minutes per station.

12.6 For purposes of the cost of service analysis (Appendix E), in forecasting the number of charging minutes for 2020 – 2022 was any allowance made for continuing impacts of COVID-19 on charging patterns?

12.6.1 If yes, what was the allowance incorporated for each year?

12.6.2 If not, why not?

13.0 Reference: Exhibit B-5, page 13, lines 22-28

13.1 Please explain why FBC considers inflation of 2%/annum to be a reasonable assumption regarding the escalation for RS 21 and O&M in the years after 2024 and 2021 respectively.

14.0 Reference: Exhibit B-5, pages 14, 17 and Appendix E, Schedule 1, lines 7 & 122-125

Preamble: The Application states (page 14): *“Assuming the price for carbon credits matches the penalty for failing compliance with RLCFRR of \$200 per tonne, FBC would receive \$268,400 per year on average over ten years”*.

14.1 Appendix E indicates that in both 2018 and 2019 the price FBC received for carbon credits was \$200/tonne. Please confirm that all available carbon credits were actually sold in each year and that this was the price received in each year.

14.1.1 If not confirmed, please explain what transactions took place in each year and the average price received.

14.1.2 If not confirmed, please explain the basis for assuming all carbon credits will be sold at a price equal to the \$200 per tonne penalty?

15.0 Reference: Exhibit B-5, pages 8, 15, 16 and Appendix E, Schedule 1 (lines 22-27) & Schedule 2 (lines 15-17)

Preamble: The Application states:

“FEI will contract FLO Services Inc. (FLO) to provide maintenance services and network management services. FLO will provide customer support services for EV drivers using the station, and will also be responsible for providing technical support for diagnosing and remedying any breakdowns or malfunctions of the DCFC stations.” (page 8)

“A transaction fee of 15 percent for global management services is charged by FLO and is added to the calculated EV rate before the transaction fee. This fee covers the network management services provided by FLO (station status monitoring, remote diagnostics/upgrades, etc.), 24/7 telephone support for customers using the DCFC stations, as well as payment collection and processing”. (page 15)

“FBC estimates that the operating and maintenance cost is \$5,193 annually per station for both 50 kW and 100 kW stations. This includes maintenance, travel, repairs outside of warranty, and FBC network management expenses including half of a full-time equivalent (FTE) employee. The operating and maintenance cost drops to \$4,900 in year 2026 as FBC expects to reduce costs related to managing network administration of FBC stations”. (page 16)

- 15.1 Are all of the charges from FLO included in the 15% transaction fee or does the OM&A forecast (per Appendix E, Schedule 1, lines 22-27) also include charges from FLO?
- 15.1.1 If the OM&A forecast includes charges from FLO please indicate:
i) what services these charges cover, ii) how the charges are determined annually and iii) for each of the 50 kW and 100 kW station analyses in Appendix E what the charges for each year and where they are captured in Schedule 1.
- 15.2 Please explain why the OM&A costs are expected to fall as of 2026 when according to the Application (pages 8 & 15) FLO provides the network management services and compensation for these services is provided through the transaction fee.
- 15.3 What are the activities carried out by the ½ FTE and is the associated cost captured in Appendix E, Schedule 1, line 23 for both the 50 kW and 100 kW stations?
- 15.4 What is included in the Non-Labour costs (per Appendix E, Schedule 1, line 24 for the 50 kW and 100 kW stations)?
- 15.5 Does the OM&A include any allowance for the recovery of FBC’s Administrative and General (A&G) costs?

- 15.5.1 If yes, where are they included in Appendix E and how were they determined?
- 15.5.2 If not, why not?
- 15.5.3 If not, please provide FBC's most recent COSA study and, based on its results, indicate the percentage A&G costs represent of total O&M costs excluding A&G and Power Purchased costs.
- 15.6 Will the ownership and operation of the DCFC charging stations impact the allocation of FI's or FHI's corporate services costs to FBC?
 - 15.6.1 If yes, what is the estimated impact for each year from 2018-2030?
 - 15.6.2 If yes, has this impact been included in the cost of service analysis set out in Appendix E and, if so, where?

16.0 Reference: Exhibit B-5, page 17, lines 1-4

- 16.1 Who is the land leased from?
 - 16.1.1 If any of land is leased from an affiliate of FBC, please indicate the basis for the lease payments?
- 16.2 Where are the annual lease payments captured in Appendix E and how much are they annually?

17.0 Reference: Exhibit B-5, page 17, lines 20-27

- 17.1 Please confirm that when FBC states that it "has used the 2020 and 2021 capital structures, as applied for, from FBC's Annual Review for 2020 and 2021 Rates" it is referring to the LT and ST debt rates and mix of LT vs. ST debt.
- 17.2 Given the impact that the COVID-19 pandemic has had on recent forecasts for both ST and LT debt rates, why is it appropriate to use the 2021 rates from the Annual Review to determine the WACC for the balance of the period?

18.0 Reference: Exhibit B-5, pages 15-16 and Appendix E, Schedule 1 lines 35-54

Preamble: The Application states: "FBC's estimates that its gross capital expenditures for the forty EV charging stations (existing and planned) across 23 sites will be \$5.17 million. To date FBC has spent \$3.48 million on EV charging stations, and plans to spend an additional \$1.69 million in 2021. These expenditures cover EV station kiosks, charger connectors, poles, towers, conductors, line transformers, civil work, installation and commissioning".

- 18.1 Please reconcile the \$5.17 M with the total project spending for 50 kW and 100 kW stations as set out in Appendix E. Note: The sum of rows 36 for 50 kW and 100 kW stations exceeds the \$5.17 M.

18.2 Are all of the capital expenditures related to facilities/equipment on the charging sites (i.e., equipment that would typically be owned and maintained by the RS 21 customer if the site was owned and operated by a third party)?

18.2.1 If yes, assuming the sites were owned and operated by a third-party RS 21 customer, would FBC's provision of service to any of the existing/planned locations have required the customer to make a capital contribution to FBC? If any such contributions would have been required: i) why were they not included in the Appendix E capital expenditures, ii) what would the annual requirements have been for the 50 kW and 100 kW stations and iii) what would the revised Schedules 1 and 2 be in each case?

18.2.2 If no, does the capital spending include amounts comparable to what a third-party RS 21 customer would have paid to FBC in contributions for providing service to the sites? If not comparable why and what is the annual dollar difference in spending for 50 kW and 100 kW stations?

19.0 Reference: Exhibit B-5, pages 8, 16 and Appendix E, Schedule 2, line 4

Preamble: The Application states (page 16): *"FBC has modelled the cost of power based on the DCFC stations taking metered electric service at FBC's existing rates for commercial service under RS 21. The model assumes a typical half hour charge session will deliver 20 kWh of energy, with thirty-four individual 50 kW stations contributing 54 kW of demand and six 100 kW station contributing 108 kW of demand to each individually metered DCFC site".*

The Application indicates (page 8) that, overall, FBC plans to have 40 stations at 23 sites.

19.1 Please confirm that, for purposes of determining the cost of electricity to DCFC stations, FBC is assuming that when all stations are in-service the total monthly billing demand across the 23 sites will be 2,484 kW (i.e., 34x54 kW plus 6x108 kW).

19.1.1 If not confirmed please indicate what the aggregate monthly billing demand will be and how it is derived.

19.2 Please provide a schedule that sets out the derivation of the annual values in Schedule 2, line 4 for the 50 kW stations.

19.3 Please provide a schedule that sets out the derivation of the annual values in Schedule 2, line 4 for the 100 kW stations.

20.0 Reference: Exhibit B-5, page 20 and Appendix E, Schedule 2, line 16

20.1 What would the levelized rates be for the 50 kW stations if EV usage was 10% or 25% lower than that embedded in the financial models?

20.2 What would the levelized rates be for the 100 kW stations if EV usage was 10% or 25% lower than that embedded in the financial models?

21.0 Reference: Exhibit B-5, pages 12 and 20-21

- 21.1 Given that there are approved meters for billing other FBC customers on a kWh basis, why is there no Measurement Canada approved metering that can be used for charging stations?
- 21.2 Are there approved meters that can be used to bill for charging station usage on a per minute/second basis?
 - 21.2.1 If yes, are there multiple suppliers such that they can be obtained at a competitive price?

22.0 Reference: Exhibit B-5, pages 22-23 and Appendix E, Schedule 2

Preamble: The Application states: *“As described above, over the term of the MRP, FBC will forecast costs and revenues associated with EV charging in each Annual Review. The costs and revenues associated with the provision of EV charging will be afforded flow-through treatment. This means that any variances between forecast and actual costs associated with the EV charging service will be accounted for in FBC’s existing Flow-through deferral account.”*

- 22.1 Will, as a part of each Annual Review, FBC be able to report the specific costs incurred and revenue accrued to date and forecast for the coming test year for DCFC charging stations?
 - 22.1.1 If not, why not?
 - 22.1.2 If yes, will FBC commit to doing so?
- 22.2 Please provide schedules for each of the 50 kW and 100 kW stations and for the total of both, that set out for each year in the period 2018-2030:
 - i. The annual revenues expected at the interim/proposed RS 96 rates.
 - ii. The annual revenue requirement (per Schedule 2).
 - iii. The net difference between the annual expected revenues and the annual forecasted revenue requirement.
- 22.3 Would FBC be amenable to the BCUC establishing a materiality threshold for the overall difference between revenue and revenue requirement as currently forecast vs. that reported as achieved/forecast in future Annual Reviews, such that if the materiality threshold was exceeded a review as to the appropriateness of the RS 96 rate would be triggered as part of the Annual Review (or separately)?
 - 22.3.1 If not, why not?
 - 22.3.2 If yes, what would FBC consider to be a reasonable materiality threshold?