

13 January 2021

**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**

Please note that Ms. Mis and I make the following submissions in response to the Commission's December 18th letter, marked as exhibit A-10 in this proceeding on behalf of our clients, a group of community-based organizations serving a very large and diverse population of British Columbians known collectively in BC Hydro regulatory proceedings as BCOAPO or BCOAPO et al.

**1. Whether additional evidence and further regulatory process are required;**

- a. If so, please identify the nature of the issues that the participant intends to pursue and the appropriate regulatory process including timelines (e.g. intervener evidence, written IRs, streamlined review process (SRP), or some combination thereof).**

After careful consideration of the record, we are of the view that a second round of written information requests is required to obtain clarifications or elaborations with respect to the evidence to date regarding:

- 1) the calculation of the total charging minutes/station usage per year over the evaluation period including the requirements per session and EV growth rates,
- 2) the carbon credit value used,
- 3) the treatment of the cost (net of revenues) incurred to date, and
- 4) the O&M costs.

BCOAPO submits that it will be able to accommodate filing of the proposed second round of Information Requests at least two weeks after the issuance of the BCUC's order establishing a further process.

BCOAPO believes that an SRP is not appropriate for this proceeding because nature of the issues is somewhat detailed (i.e., clarifying how things were calculated) and, as such, we submit that these issues are likely better left to written questions and responses if they are to be explored. For the same reason, we believe that written final argument as opposed to oral submissions would be more appropriate.

**b. If not, please indicate whether the parties should proceed to final argument.**

Please see our response to question 1 (a) above.

**2. Whether interveners intend to submit intervener evidence, and if so, please outline the nature and timing of such evidence and explain why it is within the scope of this proceeding.**

BCOAPO does not intend to file intervener evidence in this proceeding.

**3. Any other procedural matters that the Panel should consider, including any date preferences or restrictions in the event the BCUC holds an SRP.**

BCOAPO's expert Mr. Harper has availability restrictions until February 3, 2021 due to involvement in several other BCUC proceedings, as well as commitments related to proceedings in other jurisdictions. Also, Ms. Worth has availability restrictions between March 19 and April 6, 2021.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

*Original on file signed by:*

*Original on file signed by:*

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**Leigha Worth**, Executive Director  
BC Public Interest Advocacy Centre

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**Irina Mis**, Staff Lawyer  
BC Public Interest Advocacy Centre