

Date Submitted: March 28, 2021

Proceeding name: BC Hydro Public EV Fast Charging Rate

Are you currently registered as an intervener or interested party: Yes, Interested Party

Name: Paul Evans

City: QUALICUM BEACH

Province: British Columbia

Email: [REDACTED]

Phone number: [REDACTED]

Comment:

I am a resident of BC and the owner of a battery electric vehicle (BEV). I am also a ratepayer to BC Hydro.

Has Attachment:

True

Paul A Evans PEng MBA

[REDACTED]
Qualicum Beach, BC

[REDACTED]
March 27, 2021

Commissioners
BCUC
Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

Dear Commissioners
BCUC: ORDER NUMBER G-89-21

I received a copy of the Order from BC Hydro. I am astonished to note the absence of any justification to either the reasons for implementing these charges or for the magnitude of them. I took part in the very brief consultation conference call of December 7, 2020. During that call those public members participating noted the following:

- BC Hydro has no business strategy that either drove their entry into EV charging or into the development of their approach. That is, there was no understanding amongst the BC Hydro representatives about when, where, how many or capacity of the chargers they were installing.
- EV charging points provide local businesses and malls with a captive market. There had been no attempt by BC Hydro to gain offsetting revenue by preferentially siting such facilities. Even the idea of doing that seemed revolutionary to the BC Hydro representatives.
- Ironically, the sudden introduction of these charges will now likely harm those businesses that are located by chargers.
- Time-based charges are to be applied by BC Hydro. This is patently unfair to users with vehicles that charge at a slower rate. Such vehicles are typically older EVs with smaller battery packs. This means the very vehicles that are most likely to require to charge at stations away from home are the ones that will suffer the most from this arrangement.
- Since there is no easy means of comparison of the costs of charging at competing facilities, the consumer is left confused and defeated by the complexity. This is the opposite of what is needed for the advancement of this technology and hence the reduction of greenhouse gas emissions.
- EVs have been on our roads for a decade and common for five years or more. BC Hydro has not sought to have consumption charges made available to EV users. Surely that is the priority over these arbitrary time-based rates?

- Since they have no clear siting strategy, BC Hydro has scattered charging stations willy nilly across BC. Consequently, some areas lack service.
- Consideration of appropriate charging capacity is also lacking. In the US it is common to have 20 or more charging points in a single station. In stark contrast, BC Hydro has one or two charging points per station. In popular locations, users are obliged to queue and, with such limited capacity, wait times can be lengthy.
- The BC and Federal Governments have committed to lowering greenhouse gases as part of their climate change initiatives. They continue to provide rebates on lower cost EVs. The implementation of these charges is a negative message at the very time when BC Hydro should be showing leadership in addressing climate change.
- BC Hydro has committed many times to addressing the issue of the costs of home EV charging. Presently, for many EV users, the cost of home charging is effectively at Tier 2 rates. BC Hydro seeks to penalize those that use more than their model user. This means there is a disincentive to EV buyers over those that continue to pollute with ICE vehicles. This will supply further ammunition for those seeking to prolong the dominance of ICE vehicles.
- There is no market justification presented for the magnitude of these charges. At the very least, one might expect a comparison of charges from other providers in the marketplace.
- As the monopoly provider of power in BC, one would expect BC Hydro to be the “market maker” for other companies seeking to supply service to EV users. There is no discussion on what this might mean to other providers or the consequences to the market overall.

In addition to the above comments made at that single consultation event and not yet addressed, I have further concerns.

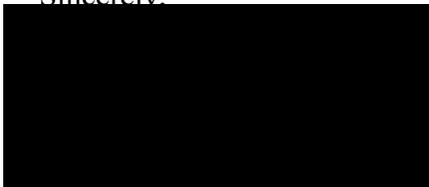
- Mainstream vehicle manufacturers from Ford through Volkswagen are committed to the rapid development of EVs. In the face of this tsunami of mobile power demand, with this request BC Hydro is demonstrating their continued lack of understanding.
- The absence of appropriate partnering causes problems to users. For example, I regularly use a BC Hydro charging station close to the BC Ferries terminal in Powell River. But because the station is not on BC Ferries property one cannot be “in the line” for the next ferry and must risk losing that ferry to charge. It is a huge lost opportunity to partner with a body that has acres of parking lots with vehicles waiting and needing to charge. It is a similar situation at Horsehoe Bay and Tsawwassen. How can such thoughtlessness be rewarded?
- Since consultation meeting, the strategy of vehicle manufacturers has become more clear. They intend to supply more plug in hybrid vehicles (PHEVs) as a stepping stone to providing BEVs. PHEVs have smaller battery capacity that typically permits short urban journeys, but this implies a greater number of vehicles will require more frequent charging but with slower charging rates. BC Hydro’s approach will deter users from top

up charging meaning greater emissions when internal combustion engines are run instead of using green energy.

- BC Hydro has not sought to understand the needs of today's consumers or to understand what the needs of tomorrow might be. A single event labelled as "consultation" does not even begin to allow the transfer of understanding. The approach of "take the money and run" may satisfy the bureaucratic needs of their organization. Rather, the act of charging will shut down any further discussion with the very users they need as their knowledge base.
- The present network of chargers should be viewed as a pilot program. It is a network from which lessons can be learned. BC Hydro gives the impression this is as far as they are prepared to take this initiative. It is time to remove the BC Hydro mandate if they think they are done with EV charger rollout. The opposite is true. They need to multiply that network and provide choices in charging capacities at metered rates. They need to partner with local governments, Crown Corporations, landowners, and developers to site charging facilities as attractants and amenities. In short, they need to engage and not to rest on their laurels. They have no laurels upon which to rest.

This application should be refused, and BC Hydro required to reapply only when they have a robust and comprehensive strategy to properly manage the business of EV charging. They should not be rewarded, or even compensated, for such a half-hearted approach to satisfying such an important demand. Residents of British Columbia deserve a considered and respectful approach that befits a such an important and urgent challenge.

Sincerely,



Paul A Evans PEng MBA