

From: Appelbaum, David [REDACTED]
Sent: May 17, 2021 8:07 AM
To: Commission, Secretary
Subject: Electrify Canada Comments - British Columbia Hydro and Power Authority Public Electric Vehicle Fast Charging Rate Application
Attachments: Electrify Canada BC Hydro Policy Commentary 5-17-21.pdf

Dear Commission Secretary Wruck,

Please find the comments, attached, from Electrify Canada, L.P., concerning the British Columbia Hydro and Power Authority's Public Electrify Vehicle Fast Charging Rate Application.

Sincerely,

David Appelbaum
Senior Counsel

Electrify America, LLC
[REDACTED]





May 17, 2021

British Columbia Utilities Commission
6th Floor – 900 Howe Street
Vancouver, BC V6Z 2V3

Attention: Patrick Wruck, Commission Secretary

**RE: BRITISH COLUMBIA HYDRO AND POWER AUTHORITY – PUBLIC
ELECTRIC VEHICLE FAST CHARGING RATE APPLICATION**

Electrify Canada, L.P., an operator of fast charging stations in the service territory of British Columbia Hydro and Power Authority (“BC Hydro”) and a customer of record of BC Hydro offers the following comments on the Application filed by BC Hydro for approval of a rate for use at BC Hydro fast charger stations. As explained below, Electrify Canada has a vested interest in the evolving market to serve Electric Vehicles (“EV”) in British Columbia. The rate at issue in the submitted application will affect the overall market for investment in the infrastructure that will support EV adoption.

As background, Electrify Canada was established in May 2018. Electrify Canada’s goal is to promote greater Zero-Emission Vehicle adoption by building transformative, EV direct current fast-charging (“DCFC”) infrastructure that gives Canadians the speed and reliability to confidently make the switch to electric.

The majority of the charging stations that Electrify Canada is building in Canada offer 350 kW electric vehicle chargers, the most powerful public DCFC available on the market today. These chargers can enable recharging speeds close to gasoline fueling for EVs expected to enter the market in the near future, with the 350 kW stations able to charge capable EVs at 32 kilometers of range per minute. In British Columbia Electrify Canada has installed 24 individual fast chargers with another 20 fast chargers currently in development.

In the instant proceeding, BC Hydro seeks approval from the British Columbia Utilities Commission (“Commission”) for approval of rates for fast charging stations currently operated by BC Hydro. As explained in the application, BC Hydro has no rate in effect for its fast-charging stations and requests Commission approval of rates that BC Hydro will charge for its own fast chargers. In the absence of a rate, all existing ratepayers, including Electrify Canada, cover the cost of providing electricity to BC Hydro’s fast charging stations.

At the outset, Electrify Canada notes for the Commission that it will not take service under the rate in the filed application. However, the Commission’s consideration of the rate that BC Hydro will use at its fast-charging stations can have a profound impact on the efforts to promote transportation electrification in British Columbia. Here, Electrify Canada encourages the Commission to recognize that the



rate that BC Hydro will utilize at its fast-charging stations can directly affect the price signal for private investment in the infrastructure that will accelerate the transition to an electrified transportation sector. As such, a holistic examination of the price of power for fast charging stations should be considered as the Commission moves forward with BC Hydro's application.

The need to consider the rates that BC Hydro will charge at its fast-charging stations is self-evident. If the Commission approves a rate for BC Hydro fast chargers that is less than the rate that BC Hydro charges private operators of fast charging stations, there is no incentive for private operators of fast charging stations to invest in BC Hydro's service territory. In this regard, the Commission should recognize that private charging companies are part of the solution in building out EV infrastructure without adding a direct burden for existing ratepayers to shoulder.

Our research and experience informs our conclusion that the transition to EV adoption and resulting reduction in Greenhouse Gas ("GHG") Emissions will be achieved through a robust network of charging options. Public facing fast chargers are an essential component of that solution because not every EV driver will have access to a residential charger. Furthermore, not every driver will have the luxury of long dwell times for charging sessions. Disadvantaged communities without access to residential charging options stand to benefit the greatest extent from policies that promote the installation of fast charger stations. Further, as noted above, the price set at those public charger stations informs the fundamental investment decisions for private charging companies.

The price signal set for investment purposes is just part of the equation. The Commission should also recognize that drivers will not transition to EVs if the price of petrol remains advantageous from a price perspective. In particular, if the price of refueling an electric vehicle remains higher than the cost of refueling fossil fuel vehicle, the promises of GHG reduction by utilizing renewable electric resources will remain elusive. Accordingly, the Commission must consider whether the rates in the submitted application will encourage EV adoption or simply recover costs from existing drivers.

In this context, the Commission should recognize the need to evaluate the cost of electricity for private charging companies as it moves forward with the pending application. If the rates set for BC Hydro are set to promote EV adoption, but BC Hydro sets a higher rate for private charging companies, the adoption of EV's will hinge on a select stakeholder. Here, the Commission should be mindful to avoid picking winners and losers at the outset of this nascent market. In particular, rate reform for the rates for public charging companies is merited with an emphasis in examining demand charges. Demand charges in rates for public facing charging stations at the nascence of EV adoption are universally punitive and cannot yield a rate that is competitive with existing fossil fuel rates. Fundamentally, an examination of the rate BC Hydro charges private operators of fast charging stations should be considered as a next step requirement with the approval the rate for BC Hydro fast chargers.



In conclusion, Electrify Canada asks the Commission to consider the full impact of the application on development of the market. Part of that evaluation and approval process should be direction to re-examine relevant BC Hydro rates, and specifically the demand charge component, that it charges private charging companies to ensure alignment of objectives. Indeed, approving the proposed rates without consideration of the impacts on private charging stakeholders and directives to remedy discriminatory impacts on such will miss a valuable opportunity for the Commission to take steps to promote EV adoption. We would welcome the opportunity to provide additional comments as may be helpful for the record and thank the Commission for the consideration of our views.

Sincerely,

/s/Robert Barrosa

Robert Barrosa

Senior Director, Sales and Marketing

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