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British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary
By web posting

Dear Sir:

Re: FortisBC Inc. Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service Application, BCUC Project No. 1598940
BC Sustainable Energy Association (BCSEA) and Vancouver Electric Vehicle Association (VEVA) Submissions per Exhibit A-18

The Commission's July 14, 2021 Order G-215-21 with Reasons¹ made certain orders and findings and established a regulatory timetable for submissions regarding:

- i. Whether the FBC proceeding should be adjourned until the BC Hydro Public Electric Vehicle Fast Charging Service Rates Application proceeding has concluded; and
- ii. If the FBC proceeding is adjourned, whether the interim rates should be amended from the existing \$0.30 per minute rate to the proposed \$0.26 per minute at 50 kW stations and \$0.54 per minute at 100 kW stations as updated in the Revised Application and amended during the course of the proceeding.

This is BCSEA-VEVA's submission.

BCSEA-VEVA respectfully submit that the FBC EV Rates proceeding should not be adjourned, for the following reasons:

1. The evidentiary record is closed and final arguments have been completed.
2. The three issues identified by the Panel – time-based versus energy-based rates, DCFC equipment life expectancy, and the effect of the non-exempt utility's rates for public fast charging on exempt providers of public fast charging² – have been fully canvassed in the FBC EV Rates proceeding. For reference, the locations of BCSEA-VEVA's submissions on these topics are set out in the following table:

¹ Exhibit A-18.

² Order G-215-21, Appendix A, p.3.

Issue	BCSEA-VEVA Submissions
time-based versus energy-based rates	BCSEA-VEVA Final Argument, paras.42-43.
DCFC equipment life expectancy	BCSEA-VEVA Final Argument, para.63; Oral Submissions, T1:51 line 20 to T1:52 line 10
effect of the non-exempt utility's rates for public fast charging on exempt providers of public fast charging	BCSEA-VEVA Final Argument, paras.48, 51-52, 53, 54

3. For more than three and a half years, FBC's EV driver-customers have been paying rates approved only on an interim basis.³ In the interest of regulatory certainty, they should be provided with final approved rates as soon as is reasonably practicable.
4. Adjourning the FBC EV Rates proceeding pending completion of the BC Hydro EV Rates proceeding could lead to significant procedural and substantive issues in a resumed FBC EV Rates proceeding. Would evidence from the BC Hydro proceeding be put on the record in the FBC proceeding? Would the parties in the FBC proceeding be entitled to challenge evidence, arguments and findings in the BC Hydro proceeding? Acknowledging that BCUC decisions are not binding on future panels in a precedential sense, what weight would the FBC panel put on the BC Hydro panel's order and reasons for decision? Recognizing that BC Hydro and FBC have provided somewhat different rationales for their proposed rates, if the panel in the BC Hydro proceeding relied on certain types of evidence not on the record in the FBC proceeding would FBC be expected to prepare and file new evidence? BCSEA-VEVA submit that regulatory efficiency and regulatory certainty would be better served by not adjourning the FBC EV Rates proceeding now that the evidentiary record is closed and final arguments have been completed.

In the alternative, if the BCUC does adjourn the FBC EV Rates proceeding pending completion of the BC Hydro EV Rates proceeding, then BCSEA-VEVA would support approval of the interim rates set out in Exhibit A-18.

All the above is respectfully submitted.

Yours truly,

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³ BCUC Order G-9-18, January 12, 2018.