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January 8, 2021

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

Attention: Ms. Marija Tresoglavic, Acting Commission Secretary

Dear Ms. Tresoglavic:

**Re: FortisBC Inc. (FBC)**

**Application for Approval of Rate Design and Rates for Electric Vehicle (EV)  
Direct Current Fast Charging (DCFC) Service – Project No. 1598940**

**FBC Proposal Regarding Accessibility of Stations**

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FBC writes to provide a proposal to address the issue of accessibility at its direct current fast charging (DCFC) stations in response to the letter filed by the BC Sustainable Energy Association and Vancouver Electric Vehicle Association (BCSEA-VEVA) dated December 11, 2020 (Exhibit C4-4) requesting an opportunity to file intervener evidence with respect to accessibility at FBC's DCFC stations.

FBC is making this proposal in advance of the January 13, 2021 date for intervener comments on process, as set out in the regulatory timetable in the British Columbia Utilities Commission (BCUC) letter dated December 18, 2020 (Exhibit A-10). FBC believes that it will be beneficial for interveners to be able to review FBC's proposal in advance so that they can comment on the proposal in their January 13 submissions on process. FBC will make submissions in reply on January 20, as per the BCUC's regulatory process.

### **FBC's Proposal to Address DCFC Station Accessibility**

FBC has had preliminary discussions with BCSEA-VEVA's expert, Mr. Courteau, in respect of their accessibility concerns. While FBC has included accessibility factors in the design and implementation of its DCFC stations, FBC acknowledges that there is room to improve accessibility at some stations. Moreover, FBC is committed to taking all reasonable steps to improve accessibility, and believes it can resolve accessibility concerns through a consultative and collaborative approach.

Specifically, FBC's commits to address accessibility at its DCFC stations through the following five steps:

1. FBC will consult with Mr. Courteau and a variety of other persons with disabilities regarding accessibility at DCFC stations. FBC recognizes that not all disabilities are the same and that a variety of perspectives would be valuable to understand accessibility concerns.
2. In consultation with Mr. Courteau and other persons with disabilities, FBC will formalize accessibility guidelines for its DCFC stations. FBC will seek to align its guidelines with BC Hydro's *EV Fast Charging: Design & Operational Guidelines For Public DCFC Stations In British Columbia*<sup>1</sup> (BC Hydro's Guidelines). FBC is aware that Mr. Courteau provided input to BC Hydro and that this input is reflected in BC Hydro's Guidelines. FBC is in general agreement with the accessibility requirements reflected in BC Hydro's Guidelines, which FBC understands Mr. Courteau is reasonably satisfied with.
3. FBC will take all reasonable steps to address any deficiencies in accessibility at its DCFC stations. Such steps could include, for example, installing curb ramps and associated level landing areas for operating DCFCs, ensuring parking stalls and landings are paved, and installing sufficient area lighting at charging sites
4. FBC will report to the BCUC on accessibility at its DCFC stations in its annual reviews. This reporting will include a summary of consultation, a review of FBC's accessibility guidelines, and a description of any improvements to accessibility that have been made, or are planned to be made, at its stations. FBC expects to substantially complete its work on accessibility by the time of the 2021 annual review process, but would continue to report annually until the consultation, guidelines and improvements are completed.
5. While FBC believes that any additional accessibility improvement costs will be minimal, any such costs can be examined during the annual review. If the costs are material enough to impact RS 96, FBC would propose amendments to RS 96 in the annual review process.

FBC submits that addressing accessibility at its DCFC stations in this manner will be efficient and effective.

### **FBC Proposal Makes Intervener Evidence on Accessibility Unnecessary**

Given FBC's commitment to address accessibility as outlined above, FBC submits that it is unnecessary to address the issue in this proceeding through intervener evidence as there is essentially no issue in dispute.

FBC agrees with BCSEA-VEVA that accessibility at its DCFC stations is an important aspect of the service, is committed to ensuring that its DCFC stations consider and implement

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<sup>1</sup> BC Hydro's *EV Fast Charging: Design & Operational Guidelines For Public DCFC Stations In British Columbia* are available at:  
<https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/power-smart/electric-vehicles/BCHydro-EV-Fast-Charging-Guidelines.pdf>

effective accessibility protocols, and is amenable to reporting at its annual reviews on its progress toward improving accessibility.

In its response to BCSEA-VEVA IR1 2.3, FBC confirmed that it has endeavored to design charging station sites which allow for stalls of sufficient width to provide adequate space for parking and an access aisle for reaching the charger, ensuring that any persons, including those with disabilities, are able to access and operate the stations. Further, in its response to BCSEA-VEVA IR1 2.1, FBC noted that it is already guided by a number of considerations during the station design and layout process including:

- Ensuring bollards/protection posts are spaced adequately (1.2m to 1.7m) to protect the charger from damage but to also allow customer access between bollards, including space to allow wheelchair access;
- Where possible, ensuring the concrete pad/base for the fast charger should be kept flush with grade so as to not make it difficult to reach the screen or charging cables;
- Designing signage and instructions for using the charger using a clear and easy-to-read font; and
- Ensuring site host agreements include provisions for keeping the charging site in a clean and tidy condition, and as required, free of ice and snow.

However, FBC acknowledges that there is room for improvement at some of its DCFC stations. For example, curbs may present obstacles for operating some DCFCs, some stalls are gravel only, and additional lighting may be required at certain locations. FBC commits to investigating and resolving these issues, and any others identified through consultation with Mr. Courteau and other persons with disabilities, where reasonable to do so.

Given the lack of disagreement between BCSEA-VEVA and FBC, FBC submits that a consultative and collaborative process is a more suitable way to address this issue, compared to seeking to resolve this issue through the filing of evidence and argument. FBC's proposal will avoid the cost and time of an extended regulatory process, and will also ultimately provide the BCUC with more helpful information, as FBC will have the opportunity to consult, develop guidelines, investigate any deficiencies and plan improvements.

FBC also notes that accessibility is not a criterion used in assessing whether a DCFC station is a prescribed undertaking under section 5 of the GGRR. Therefore, any identified issues with accessibility at FBC's DCFC stations cannot alter the BCUC's obligation to approve rates that allow FBC to recover the costs it has incurred on its prescribed undertakings.

## **Conclusion**

As outlined above, FBC commits to consulting with BCSEA-VEVA and, specifically, with Mr. Courteau and other persons with disabilities, to develop and implement a plan to improve accessibility of its stations, develop formal accessibility guidelines, and report on progress in its next annual review. FBC submits that this consultative and collaborative approach is the most suitable option to address accessibility concerns. Consequently, FBC submits that intervenor evidence in this proceeding regarding accessibility issues is not needed.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC INC.**

***Original signed:***

Diane Roy

cc (email only): Registered Parties