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February 25, 2021

Commercial Energy Consumers Association of British Columbia  
c/o Owen Bird Law Corporation  
P.O. Box 49130  
Three Bentall Centre  
2900 – 595 Burrard Street  
Vancouver, BC  
V7X 1J5

Attention: Mr. Christopher P. Weafer

Dear Mr. Weafer:

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

**Project No. 1598940**

**Application for Approval of Rate Design and Rates for Electric Vehicle (EV)  
Direct Current Fast Charging (DCFC) Service – Revised Application dated  
September 30, 2020 (Revised Application)**

**Response to the Commercial Energy Consumers Association of British  
Columbia (CEC) Information Request (IR) No. 2**

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On September 30, 2020, FBC filed the Revised Application referenced above. In accordance with BCUC Order G-33-21 setting out a further Regulatory Timetable for the review of the Revised Application, FBC respectfully submits the attached response to CEC IR No. 2.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC INC.**

***Original signed:***

Diane Roy

Attachments

cc (email only): Commission Secretary  
Registered Parties



FortisBC Inc. (FBC or the Company) Application for Approval of Rate Design and Rates for Electric Vehicle (EV) Direct Current Fast Charging (DCFC) Service (Application)	Submission Date: February 25, 2021
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1 **18. Reference: Exhibit B-10, CEC 1.7.2.1.1**

7.2.1 If there are other options available for commercial vehicle electric charging, please discuss whether or not FBC expects to implement commercial vehicle charging stations. Please explain why or why not.

7.2.1.1 If yes, please provide expected time lines.

7.2.1.2 If no, please explain why not.

2 **Response:**

FBC does not anticipate deploying public commercial charging stations to serve commercial customers. However, commercial vehicles equipped with industry standard connectors used in FBC DCFC charging stations are capable of using the public stations that FBC has deployed.

FBC anticipates that any future investment in commercial charging facilities would be limited to specific fleet customers who have entered into a commercial arrangement for FBC to provide these services.

3 7.2.2 Would FBC consider a commercial vehicle charging rate that differs from its proposed rates under any scenarios? Please explain why or why not.

7.2.2.1 If yes, please explain under what conditions this could occur, and how such rates might differ from the standard rates.

7.2.2.2 If yes, when would FBC expect to do so?

**Response:**

No, FBC would not consider a commercial vehicle charging rate as FBC is not aware of any cost basis to charge a different rate to commercial vehicles.

4  
5 18.1 Has FBC identified any specific fleet customers to which it may enter into  
6 agreements to provide fleet electric charging services?

7 18.1.1 If yes, please provide the number of fleets and vehicles in each fleet  
8 that FBC has identified.

9 18.1.2 If no, what activities is FBC undertaking to identify fleets that could  
10 benefit from independent electric charging stations?  
11

12 **Response:**

13 At this time, FBC has only had preliminary discussions with customers that are interested in  
14 dedicated charging infrastructure for their electric fleets, including local regional governments,  
15 school districts, and private operators. FBC is continuing to work with these customers to  
16 identify vehicles and charging infrastructure appropriate for their needs.

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1           18.2    Has FBC undertaken any studies to determine if commercial vehicles have  
2                   different charging needs or patterns from non-commercial customers?

3                   18.2.1    If yes, please identify the studies that FBC has undertaken.

4                   18.2.2    If no, please explain why not.

5

6    **Response:**

7    FBC has not conducted any studies specifically for the purpose of assessing the charging needs  
8    and patterns of commercial vehicles. While it is recognized that the charging needs and patterns  
9    of commercial and non-commercial vehicles are different, FBC considers the impacts of these  
10   differences insufficient to justify creating a special rate for the use of public charging stations.

11   Commercial vehicles are welcome to use FBC's public DCFC stations, or to explore a  
12   commercial agreement with FBC to build dedicated, private charging infrastructure to meet their  
13   specific needs.

14

1 **19. Exhibit B-10, CEC 1.10.1**

1 **10. Reference: Exhibit B-5, page 14**

The provincial government has identified the transportation sector as being a major contributor to GHG emissions in BC. In order to reduce GHG emissions, the *Renewable and Low Carbon Fuel Requirements Regulation* (RLCFRR or the Regulation) was introduced with the goal of reducing the carbon intensity of transportation fuels by ten percent by 2020. Carbon intensity is the amount of carbon dioxide equivalent emitted (CO<sub>2</sub>e) per unit of energy consumed, and is measured in tonnes.

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**Response:**

The following table provides data from the British Columbia Provincial Greenhouse Gas Emissions Inventory<sup>2</sup>.

**Table 1: 2018 GHG Emissions (ktCO<sub>2</sub>e) by Vehicle Type<sup>1</sup>**

Passenger Cars					Commercial Vehicles	
Gasoline			Diesel		Gasoline	Diesel
Light-duty vehicles	Light-duty trucks	Motor-cycles	Light-duty vehicles	Light-duty trucks	Heavy-duty vehicles	Heavy-duty vehicles
3,971	5,542	30	131	157	2,050	7,267
Passenger Cars Total = 9,831 ktCO <sub>2</sub> e					Commercial Vehicles Total = 9,317 ktCO <sub>2</sub> e	

**Note:**

<sup>1</sup> Vehicle types limited to "Road Transportation", as defined in the Provincial Inventory

10.2 In what ways will FBC encourage commercial vehicles to change to EV or EV type vehicle, and when will this happen?

**Response:**

FBC is supporting EV use generally through the deployment of its public fast charging service. The FBC EV stations can and will support any vehicle that uses standard (CCS and CHAdeMO) connectors. The higher-powered 100 kW stations that FBC plans to deploy in 2021 may be particularly suitable for commercial vehicles with larger batteries that can take advantage of the increased charging rate.

19.1 Please provide the number of cars that are included in each category in the above table.

**Response:**

The table above is taken from the British Columbia Provincial Greenhouse Gas Emissions Inventory<sup>1</sup>. The source data is not broken down into number of vehicles and only provides GHG emissions per category. However, it is likely that the "light-duty vehicle" categories are comprised of only "cars" since there are separate categories for trucks and other types of vehicles.

<sup>1</sup> <https://www2.gov.bc.ca/gov/content/environment/climate-change/data/provincial-inventory>.



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1  
2           19.2 To the extent that commercial vehicles contribute higher GHG emissions than  
3           passenger vehicles, would FBC agree that supporting commercial vehicle  
4           transition supports the BC government GRR objectives? Please explain.  
5

6           **Response:**

7           FBC agrees that supporting commercial vehicle transition to electricity is in line with the GRR's  
8           objectives of lowering GHG emissions. FBC is providing this support through commercial  
9           vehicles access to its public DCFC stations, as well as through engaging with fleet customers  
10          on potential commercial arrangements for dedicated charging infrastructure.